2008

Missouri Complaint Report

Statistics Section June 2009



Preface

The Missouri Department of Insurance, Financial Institutions & Professional Registration (DIFP) investigates complaints made by Missouri consumers who feel they have been treated unfairly by an insurance company. A by-product of this effort has been the creation of a detailed database documenting many years of consumer concerns. This report presents data on complaints against insurance companies received by DIFP between 2006 and 2008, and that were closed as of time of writing in 2009. Three years of complaints are pooled for each report to ensure that data are statistically credible. All complaints are included, regardless of how the complaint was resolved.

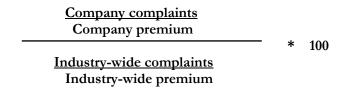
Complaint data is presented in four sections:

- Complaints by line of business
- Complaints by reason
- Complaint indices reported for the top 40 writers by line of business
- Complaint indices for all companies, by line of business

Eight business lines are included:

- Total property and casualty (excluding accident and health
- Private passenger automobile
- Homeowners (including farm, mobile home, and personal fire and allied lines
- Life and annuity
- Accident and health
- Long term care
- Medicare supplement
- HMOs

Complaint indices compare the ratio of complaints to premium for each company to the industry average, for each line of business:



An index of 100 indicates that a company received complaints at a rate equal to the industry average. An index of 10 indicates that a company's complaint ratio is only 10 percent of the industry average, while an index of 235 indicates a complaint ratio is 135 percent greater than the industry average. Indices are capped at 9,999.

Companies are identified by a unique code assigned by the National Association of Insurance Commissioners (NAIC). Companies that have had their licenses *suspended* or *terminated* are identified in the report. These companies are not currently active in Missouri, but are included so that complaint totals are accurate. Complaints against companies that have subsequently merged are counted against the surviving company.

Also Available from DIFP

Reports: The following reports are available by sending a written request along with a payment of \$35 to the Missouri Department of Insurance, P.O. Box 690, Jefferson City, MO 65102-0690.

- Missouri Market Share Report
- Missouri Real Estate Malpractice (Closed Claim Report)
- Missouri Legal Malpractice (Closed Claim Report)
- Missouri Products Liability (Closed Claim Report)
- Missouri Medical Malpractice Insurance Report
- Missouri Health Maintenance Organization Report
- Missouri Life, Accident & Health Supplement Report
- Missouri Property and Casualty Supplement Report
- Missouri Commercial Liability Report
- Missouri Mortgage Guaranty Report
- Missouri Uninsured Automobile Report

Databases: for data requests, contact the Statistics Section at 573-751-3163. Some data are available for a fee.

- Medicare Supplement Experience Data
- Property and Casualty Supplement Data
- Missouri Zip Code data for homeowners/dwelling fire, farmowners (dwelling only, mobile home, earthquake, and private passenger automobile insurance.

Many reports, including this complaint report, are available on the DIFP website, at http://www.insurance.mo.gov/reports/complaint/index.htm.

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Complaints by Line of Business

	Total Complaints by Line								
2004-2008									
Line of Business	2004	2005	2006	2007	2008				
Private Passenger Auto	1,325	1,093	1,063	993	944				
Homeowners	585	419	577	497	553				
Other P&C	353	312	254	284	248				
Total P&C Complaints	2,263	1,824	1,894	1,774	1,745				
Long Term Care	104	129	73	78	83				
Medicare Supplement	60	56	86	101	67				
НМО	277	216	136	156	121				
All Other A&H	805	818	818	1,060	1,065				
Total A&H Complaints	1,246	1,219	1,113	1,395	1,336				
Life and Annuities	582	537	485	511	453				
Total	4,091	3,580	3,492	3,680	3,534				

	Complaint Resolu	ution by Line, 2	004 - 2008					
% of Complaints Resolved with Consumer Relief								
Line of Business	2004	2005	2006	2007	2008			
Private Passenger Auto	33.9%	34.1%	37.7%	38.4%	39.4%			
Homeowners	33.7%	32.2%	30.5%	27.8%	31.5%			
Other P&C	33.1%	31.4%	32.7%	39.4%	40.3%			
Total P&C Complaints	33.7%	33.2%	34.8%	35.6%	37.0%			
Long Term Care	48.1%	34.9%	37.0%	33.3%	45.8%			
Medicare Supplement	50.0%	53.6%	54.7%	53.5%	50.7%			
НМО	45.1%	36.1%	35.3%	36.5%	39.7%			
All Other A&H	36.9%	39.0%	45.4%	43.6%	40.8%			
Total A&H Complaints	40.3%	38.7%	44.3%	42.9%	41.5%			
Life and Annuities	32.6%	31.1%	33.8%	32.5%	31.1%			
Total	35.6%	34.8%	37.7%	37.9%	38.0%			

Total Property & Casualty Complaints Excluding A&H 2006-2008

Line of Business	Complaints 2006	Complaints 2007	Complaints 2008	% Change, 2006-2008	% Change, 2007-2008
Boiler Machinery	0	1	0		-100.0%
Builders Risk	8	7	5	-37.5%	-28.6%
Commercial Auto	73	77	63	-13.7%	-18.2%
Commercial Multi-Peril	69	71	78	13.0%	9.9%
Condo/Town	7	8	9	28.6%	12.5%
Credit Property	0	2	6		200.0%
Crop/Hail	0	0	2		
Dwelling Fire	0	3	4		33.3%
Farmowner/Ranchowner	11	19	18	63.6%	- 5.3%
Federal Crop	1	1	1	0.0%	0.0%
Federal Flood	0	0	3		
Fidelity and Surety	3	2	3	0.0%	50.0%
Fire and Allied Lines - All	1	2	6	500.0%	200.0%
General Liability	18	13	17	- 5.6%	30.8%
Group Homeowners	3	0	0	-100.0%	
Group Private Passenger	1	0	0	-100.0%	
Homeowners	511	431	475	- 7.0%	10.2%
In Home/Incidental Business	0	1	0		-100.0%
Inland Marine	6	9	5	-16.7%	-44.4%
Medical Malpractice	4	1	2	-50.0%	100.0%
Mobile Homeowner	21	21	20	- 4.8%	- 4.8%
Motorcycle	8	14	7	-12.5%	-50.0%
Motorhome	8	2	9	12.5%	350.0%
Motorsport	2	1	0	-100.0%	-100.0%
Other	14	17	10	-28.6%	-41.2%
Private Mortgage Insurance	0	0	1		
Private Passenger	1,037	976	926	-10.7%	- 5.1%
Products Liability	0	0	4		
Professional Liability/E&O	3	2	2	-33.3%	0.0%
Rental	1	0	0	-100.0%	
Renters/Tenants	19	10	17	-10.5%	70.0%
Umbrella	1	2	3	200.0%	50.0%
Vehicle Service Contract	6	0	2	-66.7%	
Warranty Contract	2	10	2	0.0%	-80.0%
Watercraft	4	18	1	-75.0%	-94.4%
Workers' Compensation	52	53	44	-15.4%	-17.0%

Accident and Health Insurance Complaints by Line, 2006-2008							
	2006	2007	2008	2006-2008	2007-2008		
Individual Accident and Health	454	660	554	22.0%	-16.1%		
Group Accident and Health	519	571	660	27.2%	15.6%		
Credit Accident and Health	4	8	1	-75.0%	-87.5%		
НМО	136	156	121	-11.0%	-22.4%		
Total	1,113	1,395	1,336	20.0%	- 4.2%		

	Life and Annuities									
	Complaints by Line, 2006-2008									
Line of Business Complaints Complaints Complaints % Change, 2006- % Change, 2										
	2006	2007	2008	2008	2008					
Individual Life	310	382	319	2.9%	-16.5%					
Group Life	48	42	56	16.7%	33.3%					
Annuities	115	77	63	-45.2%	-18.2%					
Credit Life	12	10	15	25.0%	50.0%					
Total	485	511	453	- 6.6%	-11.4%					

Complaints by Reason

		y Reason, 2006-			
Reason	Complaints 2006	Complaints 2007	Complaints 2008	% Change 2006-2008	% Change 2007-2008
	Clain	n Handling			
Adjuster Handling	7	25	11	57.1%	-56.0%
Adjuster Not Responding	2	0	0	-100.0%	
Adverse Benefit Determination	2	1	3	50.0%	200.0%
Assignment of Benefits	0	0	1		
Co-pay Issues	0	1	0		-100.0%
Comparative Negligence	7	21	9	28.6%	-57.1%
Cost of Containment	0	1	0		-100.0%
Delays	228	236	249	9.2%	5.5%
Denial of Claim	173	168	127	-26.6%	-24.4%
Other	25	31	30	20.0%	- 3.2%
Post Claim Underwriting	2	2	3	50.0%	50.0%
Preexisting Condition	1	0	0	-100.0%	
Prompt Pay	3	0	1	-66.7%	
Subrogation	2	6	4	100.0%	-33.3%
Timeliness	2	0	0	-100.0%	
Total Loss	0	8	0		-100.0%
Unsatisfactory Settlement/Offer	429	320	328	-23.5%	2.5%
Usual, Customary, Reasonable	0	1	0		-100.0%
Value Dispute	1	3	0	-100.0%	-100.0%
Subtotal	884	824	766	-13.3%	- 7.0%
	M	arketing			
Agent Handling	9	6	7	-22.2%	16.7%
Delays	1	2	0	-100.0%	-100.0%
Failure to Place	2	1	0	-100.0%	-100.0%
Fiduciary Theft	0	1	0		-100.0%
Fraud/Forgery	0	1	1		0.0%
Misappropriation of Premium	0	0	1		
Misleading Advertising	0	1	1		0.0%
Other	0	1	1		0.0%
Replacement	0	1	0		-100.0%
Subtotal	12	14	11	- 8.3%	-21.4%
	Poli	cy Service			
Abusive Service	0	2	1		-50.0%
Coverage Question	18	15	15	-16.7%	0.0%
Delays / No Response	1	2	2	100.0%	0.0%
Information Requested	0	1	1		0.0%
Other	8	6	8	0.0%	33.3%

Private Passenger Automobile Insurance Complaints by Reason, 2006-2008						
Reason	Complaints 2006	Complaints 2007	Complaints 2008	% Change 2006-2008	% Change 2007-2008	
Payment Not Credited	7	0	1	-85.7%		
Policy Delivery	2	2	2	0.0%	0.0%	
Premium Notice/Billing	60	40	40	-33.3%	0.0%	
Premium Refund	18	13	21	16.7%	61.5%	
Subtotal	114	81	91	-20.2%	12.3%	
	Une	derwriting				
CLUE Reports	0	1	0		-100.0%	
Cancellation	7	24	17	142.9%	-29.2%	
Credit Report	1	1	2	100.0%	100.0%	
Credit Scoring	0	1	0		-100.0%	
Delays	0	2	0		-100.0%	
Endorsement / Rider	2	1	0	-100.0%	-100.0%	
Forced Placement	0	1	0		-100.0%	
Nonrenewal	2	5	10	400.0%	100.0%	
Other	3	1	3	0.0%	200.0%	
Premium and Rating	36	33	43	19.4%	30.3%	
Refusal to Insure	2	4	1	-50.0%	-75.0%	
Subtotal	53	74	76	43.4%	2.7%	
Total	1,063	993	944	-11.2%	- 4.9%	

Homeowners Insurance Complaints by Reason, 2006-2008						
Reason	Complaints 2006	Complaints 2007	Complaints 2008	% Change 2006-2008	% Change 2007-2008	
		n Handling				
Adjuster Handling	5	5	3	-40.0%	-40.0%	
Adjuster Not Responding	1	1	0	-100.0%	-100.0%	
Adverse Benefit Determination	0	1	1		0.0%	
Coordination of Benefits	0	0	1			
Delays	73	69	87	19.2%	26.1%	
Denial of Claim	95	109	123	29.5%	12.8%	
Other	8	4	7	-12.5%	75.0%	
Post Claim Underwriting	1	1	3	200.0%	200.0%	
Prompt Pay	1	0	0	-100.0%		
Subrogation	0	1	1		0.0%	
Timeliness	2	0	0	-100.0%	•	
Unsatisfactory Settlement/Offer	258	161	199	-22.9%	23.6%	
Willing Provider	0	1	0		-100.0%	
Subtotal	444	353	425	- 4.3%	20.4%	
	M	arketing				
Agent Handling	4	5	11	175.0%	120.0%	
Deceptive Cold Lead Advertising	0	0	1			
Delays	1	1	0	-100.0%	-100.0%	
Failure to Place	4	4	1	-75.0%	-75.0%	
Fiduciary Theft	1	0	0	-100.0%		
Fraud/Forgery	1	0	0	-100.0%		
High Pressure Tactics	0	1	0		-100.0%	
Misappropriation of Premium	1	0	1	0.0%		
Misleading Advertising	0	1	0	•	-100.0%	
Misrepresentation	0	1	3		200.0%	
Other	0	0	1	•		
Twisting	0	0	1	•		
Unfair Discrimination	0	1	0		-100.0%	
Subtotal	12	14	19	58.3%	35.7%	
	Poli	icy Service				
Abusive Service	1	0	0	-100.0%		
Coverage Question	13	22	7	-46.2%	-68.2%	
Delays / No Response	1	2	1	0.0%	-50.0%	
Information Requested	0	0	1			
Other	10	1	4	-60.0%	300.0%	
Payment Not Credited	1	0	1	0.0%		
Policy Delivery	3	4	1	-66.7%	-75.0%	

	Homeow	ners Insurance							
	Complaints by Reason, 2006-2008								
Reason	Complaints 2006	Complaints 2007	Complaints 2008	% Change 2006-2008	% Change 2007-2008				
Premium Notice/Billing	24	17	19	-20.8%	11.8%				
Premium Refund	12	14	9	-25.0%	-35.7%				
Subtotal	65	60	43	-33.8%	-28.3%				
	Une	derwriting							
CLUE Reports	1	2	0	-100.0%	-100.0%				
Cancellation	11	14	12	9.1%	-14.3%				
Credit Report	2	3	4	100.0%	33.3%				
Credit Scoring	1	7	2	100.0%	-71.4%				
Delays	1	1	0	-100.0%	-100.0%				
Endorsement / Rider	3	1	0	-100.0%	-100.0%				
Nonrenewal	19	17	17	-10.5%	0.0%				
Other	1	2	1	0.0%	-50.0%				
Premium and Rating	16	22	28	75.0%	27.3%				
Rate Classification	0	1	0		-100.0%				
Refusal to Insure	1	0	0	-100.0%					
Surcharge	0	0	2						
Subtotal	56	70	66	17.9%	- 5.7%				
Total	577	497	553	- 4.2%	11.3%				

Accident and Health Insurance Complaints by Reason, 2006-2008							
Reason	Complaints 2006	Complaints 2007	Complaints 2008	% Change 2006-2008	% Change 2007-2008		
	Clair	n Handling					
Adjuster Handling	0	0	1				
Assignment of Benefits	0	0	1				
Co-pay Issues	1	0	0	-100.0%			
Coordination of Benefits	6	3	2	-66.7%	-33.3%		
Cost of Containment	1	3	0	-100.0%	-100.0%		
Delays	115	147	138	20.0%	- 6.1%		
Denial of Claim	414	445	552	33.3%	24.0%		
Experimental	8	3	3	-62.5%	0.0%		
Fraud	0	0	1	•	•		
Lead	0	0	1	•	•		
Medical Necessity	10	9	17	70.0%	88.9%		
Other	98	257	330	236.7%	28.4%		
Other-Pre-Existing	0	1	1	•	0.0%		
Other-Provider Balance Billing	1	0	1	0.0%			
Out-of-Network Benefits	1	0	4	300.0%			
PCP Referrals	0	1	1		0.0%		
Post Claim Underwriting	2	1	1	-50.0%	0.0%		
Preexisting Condition	1	1	2	100.0%	100.0%		
Prompt Pay	0	0	6	•			
Total Loss	0	1	0	•	-100.0%		
Unsatisfactory Settlement/Offer	74	47	9	-87.8%	-80.9%		
Usual, Customary, Reasonable	1	2	1	0.0%	-50.0%		
Utilization Review	0	0	7				
Subtotal	733	921	1,079	47.2%	17.2%		
	M	arketing					
Agent Handling	7	10	8	14.3%	-20.0%		
Delays	6	2	3	-50.0%	50.0%		
Duplication of Coverage	0	0	1				
Failure to Place	1	1	0	-100.0%	-100.0%		
Fiduciary Theft	0	1	0	•	-100.0%		
Fraud/Forgery	5	1	3	-40.0%	200.0%		
High Pressure Tactics	5	5	1	-80.0%	-80.0%		
Misleading Advertising	1	2	0	-100.0%	-100.0%		
Misrepresentation	16	39	15	- 6.3%	-61.5%		
Misstatement on Application	0	0	2				
Policy Delivery	0	1	0	•	-100.0%		
Suitability	1	0	0	-100.0%			

		d Health Insura			
		y Reason, 2006-			
Reason	Complaints 2006	Complaints 2007	Complaints 2008	% Change 2006-2008	% Change 2007-2008
Subtotal	42	62	33	-21.4%	-46.8%
	Poli	cy Service			
Access to Care	8	5	1	-87.5%	-80.0%
Coverage Question	93	173	32	-65.6%	-81.5%
Delays / No Response	8	6	3	-62.5%	-50.0%
Information Requested	1	0	1	0.0%	
Other	7	9	7	0.0%	-22.2%
Payment Not Credited	2	2	1	-50.0%	-50.0%
Policy Delivery	0	0	2		
Premium Notice/Billing	13	23	25	92.3%	8.7%
Premium Refund	28	17	16	-42.9%	- 5.9%
Surrender Problems	0	1	1		0.0%
Subtotal	160	236	89	-44.4%	-62.3%
	Une	derwriting			
Cancellation	8	4	3	-62.5%	-25.0%
Delays	3	2	0	-100.0%	-100.0%
Endorsement / Rider	1	0	0	-100.0%	
Nonrenewal	0	0	1		
Other	6	3	1	-83.3%	-66.7%
Premium and Rating	19	5	6	-68.4%	20.0%
Rate Classification	0	1	1		0.0%
Refusal to Insure	4	3	2	-50.0%	-33.3%
Rescission	1	2	0	-100.0%	-100.0%
Subtotal	42	20	14	-66.7%	-30.0%
Total	977	1,239	1,215	24.4%	- 1.9%

		n Care Insurancy y Reason, 2006-			
Reason	Complaints D Complaints 2006	Complaints 2007	Complaints 2008	% Change 2006-2008	% Change 2007-2008
	Clair	n Handling			
Cost of Containment	0	1	0		-100.0%
Delays	16	25	18	12.5%	-28.0%
Denial of Claim	10	13	23	130.0%	76.9%
Other	10	14	28	180.0%	100.0%
Unsatisfactory Settlement/Offer	6	1	0	-100.0%	-100.0%
Subtotal	42	54	69	64.3%	27.8%
	M	arketing			
Agent Handling	2	2	0	-100.0%	-100.0%
Delays	2	0	0	-100.0%	
Misrepresentation	2	0	0	-100.0%	
Subtotal	6	2	0	-100.0%	-100.0%
	Pol	icy Service			
Coverage Question	3	10	2	-33.3%	-80.0%
Delays / No Response	3	0	1	-66.7%	
Other	1	0	0	-100.0%	
Premium Notice/Billing	2	9	4	100.0%	-55.6%
Premium Refund	2	2	1	-50.0%	-50.0%
Subtotal	11	21	8	-27.3%	-61.9%
	Une	derwriting			
Cancellation	1	0	0	-100.0%	
Delays	1	0	0	-100.0%	
Premium and Rating	12	1	5	-58.3%	400.0%
Rate Classification	0	0	1		
Subtotal	14	1	6	-57.1%	500.0%
Total	73	78	83	13.7%	6.4%

		pplement Insura by Reason, 2006-			
Reason	Complaints 2006	Complaints 2007	Complaints 2008	% Change 2006-2008	% Change 2007-2008
	Clair	n Handling			
Coordination of Benefits	0	1	0		-100.0%
Delays	6	14	4	-33.3%	-71.4%
Denial of Claim	18	12	14	-22.2%	16.7%
Experimental	0	0	1		
Other	12	36	30	150.0%	-16.7%
Out-of-Network Benefits	0	0	1		
Provider Balance Billing	1	0	0	-100.0%	
Unsatisfactory Settlement/Offer	4	1	2	-50.0%	100.0%
Subtotal	41	64	52	26.8%	-18.8%
	M	larketing			
Agent Handling	1	0	0	-100.0%	
Delays	1	2	0	-100.0%	-100.0%
Failure to Place	1	0	0	-100.0%	
Fiduciary Theft	0	1	0		-100.0%
High Pressure Tactics	3	2	0	-100.0%	-100.0%
Misrepresentation	7	5	4	-42.9%	-20.0%
Subtotal	13	10	4	-69.2%	-60.0%
	Pol	icy Service			
Access to Care	1	0	0	-100.0%	
Coverage Question	8	11	0	-100.0%	-100.0%
Delays / No Response	1	0	1	0.0%	
Other	1	4	1	0.0%	-75.0%
Payment Not Credited	0	1	0		-100.0%
Policy Delivery	0	0	1		
Premium Notice/Billing	6	3	5	-16.7%	66.7%
Premium Refund	10	4	3	-70.0%	-25.0%
Subtotal	27	23	11	-59.3%	-52.2%
	Un	derwriting			
Cancellation	1	0	0	-100.0%	
Delays	1	0	0	-100.0%	
Premium and Rating	2	3	0	-100.0%	-100.0%
Rate Classification	0	1	0		-100.0%
Refusal to Insure	1	0	0	-100.0%	
Subtotal	5	4	0	-100.0%	-100.0%
Total	86	101	67	-22.1%	-33.7%

		nd Annuities y Reason, 2006-	2008		
Reason	Complaints 2006	Complaints 2007	Complaints 2008	% Change 2006-2008	% Change 2007-2008
		n Handling			
Assignment of Benefits	0	0	1		
Delays	67	66	64	- 4.5%	- 3.0%
Denial of Claim	52	34	50	- 3.8%	47.1%
Fraud	0	0	1		
Other	107	197	191	78.5%	- 3.0%
Unsatisfactory Settlement/Offer	16	7	3	-81.3%	-57.1%
Value Dispute	0	0	1		
Subtotal	242	304	311	28.5%	2.3%
	M	arketing			
Agent Handling	18	12	4	-77.8%	-66.7%
Churning	2	3	2	0.0%	-33.3%
Delays	5	1	0	-100.0%	-100.0%
Failure to Place	0	1	0		-100.0%
Fiduciary Theft	0	1	0		-100.0%
Fraud/Forgery	1	5	2	100.0%	-60.0%
High Pressure Tactics	3	1	1	-66.7%	0.0%
Misappropriation of Premium	3	0	2	-33.3%	
Misleading Advertising	1	0	0	-100.0%	
Misrepresentation	35	23	38	8.6%	65.2%
Not Licensed	2	0	2	0.0%	
Replacement	2	1	5	150.0%	400.0%
Suitability	11	11	1	-90.9%	-90.9%
Subtotal	83	59	57	-31.3%	- 3.4%
	Poli	cy Service			
1035 Exchange	0	0	1		
Abusive Service	1	0	0	-100.0%	
Cash Value	20	19	39	95.0%	105.3%
Coverage Question	36	54	8	-77.8%	-85.2%
Delays / No Response	23	17	5	-78.3%	-70.6%
Information Requested	11	13	7	-36.4%	-46.2%
Other	15	8	3	-80.0%	-62.5%
Payment Not Credited	2	3	3	50.0%	0.0%
Policy Delivery	2	0	0	-100.0%	
Premium Notice/Billing	15	17	12	-20.0%	-29.4%
Premium Refund	14	3	3	-78.6%	0.0%
Surrender Problems	1	5	1	0.0%	-80.0%
Subtotal	140	139	82	-41.4%	-41.0%

Life and Annuities							
Complaints by Reason, 2006-2008							
Reason	Reason Complaints Complaints Complaints % Change						
	2006	2007	2008	2006-2008	2007-2008		
	Uno	derwriting					
Cancellation	3	4	1	-66.7%	-75.0%		
Continuation of Benefits	0	0	1				
Delays	3	1	1	-66.7%	0.0%		
Endorsement / Rider	1	1	0	-100.0%	-100.0%		
Other	1	1	0	-100.0%	-100.0%		
Premium and Rating	10	1	0	-100.0%	-100.0%		
Rate Classification	1	0	0	-100.0%			
Refusal to Insure	1	1	0	-100.0%	-100.0%		
Subtotal	20	9	3	-85.0%	-66.7%		
Total	485	511	453	- 6.6%	-11.4%		

		nance Organiza y Reason, 2006-			
Reason	Complaints 2006	Complaints 2007	Complaints 2008	% Change 2006-2008	% Change 2007-2008
	Clair	n Handling			
Coordination of Benefits	3	0	0	-100.0%	
Cost of Containment	2	1	0	-100.0%	-100.0%
Delays	7	6	7	0.0%	16.7%
Denial of Claim	65	74	59	- 9.2%	-20.3%
Experimental	6	1	0	-100.0%	-100.0%
Medical Necessity	3	4	2	-33.3%	-50.0%
Other	12	25	31	158.3%	24.0%
Prompt Pay	0	0	3		•
Unsatisfactory Settlement/Offer	13	5	2	-84.6%	-60.0%
Utilization Review	0	0	2		
Subtotal	111	116	106	- 4.5%	- 8.6%
	M	arketing			
Agent Handling	0	2	4		100.0%
Delays	0	1	1		0.0%
Fraud/Forgery	0	1	0		-100.0%
High Pressure Tactics	1	0	0	-100.0%	•
Misrepresentation	4	8	7	75.0%	-12.5%
Subtotal	5	12	12	140.0%	0.0%
	Poli	icy Service			
Access to Care	2	2	1	-50.0%	-50.0%
Coverage Question	13	19	1	-92.3%	-94.7%
Delays / No Response	1	0	0	-100.0%	•
Other	2	2	0	-100.0%	-100.0%
Premium Notice/Billing	1	3	1	0.0%	-66.7%
Subtotal	19	26	3	-84.2%	-88.5%
	Une	derwriting			
Cancellation	0	1	0		-100.0%
Premium and Rating	0	1	0		-100.0%
Refusal to Insure	1	0	0	-100.0%	
Subtotal	1	2	0	-100.0%	-100.0%
Total	136	156	121	-11.0%	-22.4%

Complaint Indices

Top 40 Writers by Line

Ordered by Market Share

	Property and Casualty Insurance Complain Top Forty Writers			Health)	
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2008- 2008	Complaint Index
19275	American Family Mutual Insurance Company	568	\$794,528,265	9.5%	110
25178	State Farm Mutual Automobile Insurance Co	303	\$595,038,294	7.1%	79
25143	State Farm Fire & Casualty Company	301	\$468,862,444	5.6%	99
23388	Shelter Mutual Insurance Company	208	\$275,293,006	3.3%	117
35289	Continental Insurance Company The	3	\$161,423,623	1.9%	3
10191	Missouri Employers Mutual Insurance Company	24	\$138,136,347	1.7%	27
21628	Farmers Insurance Company Inc	137	\$133,377,451	1.6%	159
26859	Farm Bureau Town & Country Ins Co Of MO	170	\$124,046,716	1.5%	212
39012	Safeco Insurance Company Of Illinois	156	\$123,074,110	1.5%	196
23035	Liberty Mutual Fire Insurance Company	55	\$90,404,983	1.1%	94
15512	Automobile Club Inter-insurance Exchange	97	\$90,124,539	1.1%	166
17230	Allstate Property & Casualty Insurance Company	112	\$84,887,713	1.0%	204
21687	Mid Century Insurance Company	105	\$80,682,390	1.0%	201
20281	Federal Insurance Company	4	\$80,415,669	1.0%	8
16535	Zurich American Insurance Company	8	\$79,671,073	1.0%	16
10555	Cincinnati Insurance Company The	15	\$78,354,321	0.9%	30
19380	* ·	30		0.9%	60
19232	American Home Assurance Company	117	\$76,935,826 \$74,207,602	0.9%	
	Allstate Insurance Company		\$74,297,692		243
20699	Ace Property & Casualty Insurance Company	0	\$72,680,441 \$72,110,014	0.9%	106
19283	American Standard Insurance Co of WI	87	\$72,110,014	0.9%	186
19445	National Union Fire Ins Co of Pittsburgh	7	\$71,559,614	0.9%	15
25674	Travelers Prop Casualty Co of America	12	\$68,199,618	0.8%	27
22667	Ace American Insurance Company	10	\$67,328,162	0.8%	23
37834	Progressive Preferred Insurance Company	75	\$66,243,394	0.8%	175
19100	AMCO Insurance Company	36	\$62,717,242	0.8%	89
20443	Continental Casualty Company	6	\$62,538,724	0.7%	15
25941	United Services Automobile Association	36	\$57,526,216	0.7%	97
21326	Empire Fire & Marine Insurance Co	8	\$54,438,953	0.7%	23
30104	Hartford Underwriters Insurance Company	37	\$53,575,152	0.6%	107
24740	Safeco Insurance Company Of America	52	\$52,736,268	0.6%	152
21482	Factory Mutual Insurance Company	0	\$50,562,656	0.6%	0
15725	Cameron Mutual Insurance Company	43	\$48,701,511	0.6%	136
27235	Auto Club Family Insurance Company	81	\$47,068,671	0.6%	266
18988	Auto Owners Insurance Company	21	\$46,795,028	0.6%	69
35882	GEICO General Ins Co	63	\$45,382,131	0.5%	214
23515	Midwestern Indemnity Company The	27	\$44,160,331	0.5%	94
22136	Great American Insurance Company Of NY	2	\$43,811,790	0.5%	7
19682	Hartford Fire Insurance Company	10	\$43,440,900	0.5%	36
19410	Commerce & Industry Insurance Co	12	\$42,685,779	0.5%	43
11582	Missouri Professionals Mutual	3	\$41,308,384	0.5%	11
	Top 40 Writers	3,041	\$4,765,125,441	57.0%	
	Total	5,413	\$8,356,360,928	100.0%	

Private Passenger Automobile Insurance Complaint Indices
Top Forty Writers by Market Share

	Top Forty Writers by Market Share							
Code	Name	Complaints	Average Annual	Average	Complaint			
		2006-2008	Premium 2006-	Market	Index			
			2008	Share				
				2006-				
				2008				
25178	State Farm Mutual Automobile Insurance Co	297	\$576,526,936	20.8%	48			
19275	American Family Mutual Insurance Company	303	\$433,329,229	15.7%	65			
23388	Shelter Mutual Insurance Company	86	\$145,341,596	5.2%	55			
21628	Farmers Insurance Company Inc	136	\$133,377,451	4.8%	94			
39012	Safeco Insurance Company Of Illinois	156	\$123,074,110	4.4%	117			
15512	Automobile Club Inter-insurance Exchange	97	\$89,851,869	3.2%	100			
19283	American Standard Insurance Co of WI	87	\$72,085,297	2.6%	111			
37834	Progressive Preferred Insurance Company	73	\$66,092,407	2.4%	102			
17230	Allstate Property & Casualty Insurance Company	71	\$56,155,762	2.0%	117			
26859	Farm Bureau Town & Country Ins Co Of MO	61	\$55,292,699	2.0%	102			
19232	Allstate Insurance Company	66	\$46,926,155	1.7%	130			
35882	GEICO General Ins Co	63	\$45,382,117	1.6%	128			
25143	State Farm Fire & Casualty Company	39	\$44,798,493	1.6%	80			
25941	United Services Automobile Association	31	\$36,894,790	1.3%	78			
16322	Progressive Direct Insurance Company	34	\$35,935,934	1.3%	87			
21687	Mid Century Insurance Company	43	\$31,831,056	1.1%	125			
24279	Progressive Max Insurance Company	34	\$31,332,396	1.1%	100			
42919	Progressive Northwestern Insurance Company	46	\$28,943,545	1.0%	147			
23035	Liberty Mutual Fire Insurance Company	24	\$27,786,037	1.0%	80			
42579	Allied Property & Casualty Insurance Company	16	\$27,347,665	1.0%	54			
27998	Travelers Home & Marine Insurance Company	18	\$26,982,776	1.0%	62			
29688	Allstate Fire & Casualty Insurance Company	24	\$25,842,859	0.9%	86			
25968	USAA Casualty Insurance Company	9	\$21,871,512	0.8%	38			
22055	GEICO Indemnity Company	35	\$21,731,436	0.8%	149			
22063	Government Employees Insurance Co	26	\$18,963,091	0.7%	127			
15725	Cameron Mutual Insurance Company	19	\$18,273,739	0.7%	96			
28401	American National Property & Casualty Co	14	\$17,234,764	0.6%	75			
26093	Nationwide Affinity Insurance Co Of America	14	\$16,977,042	0.6%	76			
10783	Cornerstone National Insurance Company	20	\$16,308,310	0.6%	113			
30104	Hartford Underwriters Insurance Company	23	\$16,032,246	0.6%	132			
25712	Esurance Insurance Company	36	\$15,695,459	0.6%	212			
23515	Midwestern Indemnity Company The	13	\$15,595,845	0.6%	77			
21164	Dairyland Insurance Company	19	\$14,435,144	0.5%	121			
34690	Property & Casualty Insurance Co of Hartford	21	\$13,256,836	0.5%	146			
27235	Auto Club Family Insurance Company	30	\$12,594,204	0.5%	220			
42609	Affirmative Insurance Company	117	\$12,513,083	0.5%	863			
40371	Columbia Mutual Insurance Company	15	\$12,068,718	0.4%	115			
19852	Financial Indemnity Company	39	\$11,466,543	0.4%	314			
29459	Twin City Fire Insurance Company	17	\$10,388,467	0.4%	151			
19100	AMCO Insurance Company	9	\$9,937,443	0.4%	84			
	Top 40 Writers	2,281	\$2,436,475,062	88.0%	•			
	Total	3,000	\$2,768,694,291	100.0%	•			

Homeowners Insurance Complaint Indices
Top Forty Writers by Market Share

	Top Forty Writers by Market Share							
Code	Name	Complaints	Average	Average	Complaint			
		2006-2008	Annual	Market	Index			
			Premium 2006-	Share				
			2008	2006-				
				2008				
25143	State Farm Fire & Casualty Company	246	\$332,364,650	23.7%	64			
19275	American Family Mutual Insurance Company	211	\$248,925,441	17.8%	73			
23388	Shelter Mutual Insurance Company	114	\$103,282,617	7.4%	95			
26859	Farm Bureau Town & Country Ins Co Of MO	96	\$56,297,348	4.0%	147			
21687	Mid Century Insurance Company	62	\$40,385,701	2.9%	132			
24740	Safeco Insurance Company Of America	42	\$37,790,271	2.7%	96			
27235	Auto Club Family Insurance Company	51	\$31,947,485	2.3%	138			
17230	Allstate Property & Casualty Insurance Co	38	\$27,546,469	2.0%	119			
21660	Fire Insurance Exchange	39	\$27,471,981	2.0%	122			
19070	Standard Fire Insurance Company	45	\$25,879,122	1.8%	150			
19240	Allstate Indemnity Company	44	\$24,831,287	1.8%	153			
19232	Allstate Insurance Company	44	\$20,011,586	1.4%	189			
23035	Liberty Mutual Fire Insurance Company	19	\$19,372,896	1.4%	84			
25941	United Services Automobile Association	5	\$17,925,101	1.3%	24			
19100	AMCO Insurance Company	9	\$17,696,280	1.3%	44			
15725	Cameron Mutual Insurance Company	18	\$17,003,626	1.2%	91			
18988	Auto Owners Insurance Company	10	\$15,530,174	1.1%	55			
42978	American Security Insurance Company	8	\$14,957,752	1.1%	46			
23515	Midwestern Indemnity Company The	11	\$11,426,099	0.8%	83			
28401	American National Property & Casualty Co	13	\$11,136,624	0.8%	101			
42579	Allied Property & Casualty Insurance Co	14	\$10,561,428	0.8%	114			
21482	Factory Mutual Insurance Company	0	\$9,854,805	0.7%	0			
21849	American Automobile Insurance Company	3	\$9,677,171	0.7%	27			
21652	Farmers Insurance Exchange	26	\$9,559,611	0.7%	234			
20990	Country Mutual Insurance Company	21	\$9,200,264	0.7%	197			
25968	USAA Casualty Insurance Company	2	\$8,697,838	0.6%	20			
27998	Travelers Home & Marine Insurance Company	11	\$8,597,556	0.6%	110			
34690	Property & Casualty Insurance Co of Hartford	12	\$8,562,778	0.6%	121			
30104	Hartford Underwriters Insurance Company	12	\$8,562,037	0.6%	121			
11185	Foremost Insurance Company	20	\$8,553,062	0.6%	201			
20303	Great Northern Insurance Company	0	\$7,946,875	0.6%	0			
14400	Lititz Mutual Insurance Company	10	\$7,844,612	0.6%	110			
23787	Nationwide Mutual Insurance Company	4	\$6,878,110	0.5%	50			
24260	Progressive Casualty Insurance Company	19	\$5,639,822	0.4%	290			
25180	Fidelity National Insurance Company	30	\$5,451,498	0.4%	474			
25127	State Auto Property & Casualty Insurance Co	4	\$5,359,641	0.4%	64			
20419	Homesite Indemnity Company	39	\$5,281,305	0.4%	636			
40371	Columbia Mutual Insurance Company	3	\$4,959,654	0.4%	52			
41513	Foremost Signature Insurance Company	5	\$4,849,614	0.3%	89			
10677	Cincinnati Insurance Company The	3	\$4,729,508	0.3%	55			
	Top 40 Writers	1,363	\$1,252,549,697	89.4%	•			
	Total	1,627	\$1,401,697,926	100.0%	•			

Accident and Health Insurance Complaint Indices
Top Forty Writers by Market Share

Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
78972	Healthy Alliance Life Insurance Co	1,090	\$1,497,904,678	23.7%	134
79413	United Healthcare Insurance Company	331	\$936,155,061	14.8%	65
47171	Blue Cross & Blue Shield Of Kansas City	190	\$568,651,022	9.0%	61
73288	Humana Insurance Company	59	\$342,099,675	5.4%	32
81973	Coventry Health & Life Insurance Company	85	\$326,837,780	5.2%	48
11529	Mercy Health Plans	53	\$190,137,164	3.0%	51
60054	Aetna Life Insurance Company	45	\$135,917,059	2.2%	61
19445	National Union Fire Ins Co of Pittsburgh	18	\$116,766,767	1.9%	28
65978	Metropolitan Life Insurance Company	20	\$85,202,509	1.4%	43
61271	Principal Life Insurance Company	51	\$79,563,488	1.3%	118
60380	American Family Life Assurance Co of Col.	41	\$76,529,199	1.2%	99
64246	Guardian Life Insurance Company Of America	21	\$62,425,799	1.0%	62
70815	Hartford Life & Accident Insurance Company	13	\$57,346,627	0.9%	42
60040	Cox Health Systems Insurance Company	32	\$56,786,485	0.9%	104
62308	Connecticut General Life Ins Co	20	\$55,499,646	0.9%	66
71412	Mutual Of Omaha Insurance Company	26	\$54,074,440	0.9%	88
90328	First Health Life & Health Insurance Company	1	\$53,643,790	0.9%	3
62235	Unum Life Insurance Company Of America	29	\$51,947,754	0.8%	103
62286	Golden Rule Insurance Company	52	\$48,791,451	0.8%	196
69477	Time Insurance Company	94	\$44,814,968	0.7%	386
61263	Bankers Life & Casualty Company	79	\$44,079,539	0.7%	330
60305	American Community Mutual Insurance Co	79	\$42,753,793	0.7%	340
67660	Pennsylvania Life Insurance Company	5	\$42,251,602	0.7%	22
28207	Anthem Insurance Companies Inc	0	\$37,068,185	0.6%	0
70025	Genworth Life Insurance Company	13	\$33,670,196	0.5%	71
69019	Standard Insurance Company	15	\$33,054,119	0.5%	83
19275	American Family Mutual Insurance Company	13	\$32,486,788	0.5%	74
70408	Union Security Insurance Company	14	\$31,541,234	0.5%	82
25178	State Farm Mutual Automobile Insurance Co	2	\$31,536,564	0.5%	12
60836	American Republic Insurance Company	16	\$31,052,930	0.5%	95
80314	Unicare Life & Health Insurance Company	16	\$29,596,823	0.5%	99
32395	Vision Service Plan Insurance Company	1	\$27,640,989	0.4%	7
86231	Transamerica Life Insurance Company	37	\$25,604,546	0.4%	266
92916	United American Insurance Company	68	\$25,472,261	0.4%	491
10155	Wellcare Prescription Insurance Inc	1	\$23,229,516	0.4%	8
65099	John Hancock Life Insurance Company	8	\$23,064,111	0.4%	64
68500	Continental Life Ins Co Of Brentwood TN	6	\$22,748,618	0.4%	49
62146	Combined Insurance Co Of America	18	\$22,251,364	0.4%	149
13935	Federated Mutual Insurance Company	8	\$20,988,686	0.3%	70
16535	Zurich American Insurance Company	3	\$19,648,536	0.3%	28
	Top 40 Writers	2,673	\$5,440,835,760	86.2%	
	Total	3,431	\$6,309,213,882	100.0%	

Long Term Care Insurance Complaint Indices
Top Forty Writers by Market Share

	Top Forty Writers by Market Share							
Code	Name	Complaints	Average Annual	Average	Complaint			
		2006-2008	Premium	Market	Index			
			2006-2008	Share				
				2006-				
				2008				
70025	Genworth Life Insurance Company	13	\$33,513,836	15.3%	36			
65099	John Hancock Life Insurance Company	8	\$22,942,304	10.4%	33			
65978	Metropolitan Life Insurance Company	4	\$20,074,935	9.1%	19			
61263	Bankers Life & Casualty Company	54	\$19,632,380	8.9%	258			
86231	Transamerica Life Insurance Company	22	\$12,114,873	5.5%	171			
62235	Unum Life Insurance Company Of America	1	\$9,690,222	4.4%	10			
62952	Equitable Life & Casualty Insurance Company	10	\$8,664,050	3.9%	108			
56014	Thrivent Financial For Lutherans	0	\$7,402,156	3.4%	0			
20443	Continental Casualty Company	6	\$6,735,128	3.1%	84			
76325	Senior Health Insurance Company of PA	46	\$6,282,813	2.9%	687			
71412	Mutual Of Omaha Insurance Company	1	\$5,291,541	2.4%	18			
25178	State Farm Mutual Automobile Insurance Co	0	\$5,173,734	2.4%	0			
90611	Allianz Life Insurance Co Of North America	0	\$5,115,481	2.3%	0			
65595	Lincoln Benefit Life Company	2	\$4,703,348	2.1%	40			
65005	Riversource Life Insurance Company	1	\$3,893,998	1.8%	24			
31119	Medico Insurance Company	5	\$3,337,248	1.5%	141			
68241	Prudential Insurance Company Of America The	0	\$2,973,742	1.4%	0			
66915	New York Life Insurance Company	0	\$2,818,850	1.3%	0			
69000	Northwestern Long Term Care Insurance Co	0	\$2,796,647	1.3%	0			
63282	Penn Treaty Network America Ins Co-Suspended-	5	\$2,737,664	1.2%	171			
65021	Stonebridge Life Insurance Company	18	\$2,217,325	1.0%	762			
87726	Metlife Insurance Company Of Connecticut	2	\$1,741,920	0.8%	108			
69477	Time Insurance Company	0	\$1,695,559	0.8%	0			
70408	Union Security Insurance Company	0	\$1,692,418	0.8%	0			
65935	Massachusetts Mutual Life Insurance Company	0	\$1,543,868	0.7%	0			
58033	Knights Of Columbus	0	\$1,467,719	0.7%	0			
70319	Washington National Insurance Co	7	\$1,166,649	0.5%	563			
80578	Physicians Mutual Insurance Company	0	\$1,010,762	0.5%	0			
60534	American Heritage Life Insurance Company	2	\$997,426	0.5%	188			
60836	American Republic Insurance Company	1	\$982,871	0.4%	96			
71404	Continental General Insurance Company	1	\$981,207	0.4%	96			
71471	Medico Life Insurance Company	0	\$975,841	0.4%	0			
69116	State Life Insurance Company	0	\$930,055	0.4%	0			
64211	Guarantee Trust Life Insurance Co	1	\$880,219	0.4%	107			
60593	National States Insurance Company	2	\$868,137	0.4%	216			
92916	United American Insurance Company	2	\$838,632	0.4%	224			
19275	American Family Mutual Insurance Company	0	\$815,238	0.4%	0			
47171	Blue Cross & Blue Shield Of Kansas City	1	\$748,661	0.3%	125			
68195	Provident Life & Accident Insurance Company	0	\$724,844	0.3%	0			
42129	United Security Assurance Company Of PA	0	\$699,515	0.3%	0			
	Top 40 Writers	215	\$208,873,816	95.1%	•			
	Total	234	\$219,719,269	100.0%	•			

Medicare Supplement Insurance Complaint Indices	
Top Forty Writers by Market Share	

Code	Top Forty Writer Name	Complaints	Average Annual	Average	Complaint
Gode	1 vanie	2006-2008	Premium 2006- 2008	Market Share 2006-	Index
				2008	
79413	United Healthcare Insurance Company	16	\$137,278,700	25.5%	25
78972	Healthy Alliance Life Insurance Co	66	\$81,527,706	15.1%	172
71412	Mutual Of Omaha Insurance Company	11	\$35,016,678	6.5%	67
47171	Blue Cross & Blue Shield Of Kansas City	15	\$27,387,217	5.1%	116
60836	American Republic Insurance Company	6	\$24,640,614	4.6%	52
68500	Continental Life Ins Co Of Brentwood TN	5	\$21,786,052	4.0%	49
61263	Bankers Life & Casualty Company	19	\$21,363,775	4.0%	189
61859	Christian Fidelity Life Insurance Co	1	\$17,488,424	3.2%	12
72850	United World Life Insurance Company	4	\$13,816,007	2.6%	61
25178	State Farm Mutual Automobile Insurance Co	0	\$10,734,039	2.0%	0
57657	Royal Neighbors Of America	0	\$10,688,704	2.0%	0
92916	United American Insurance Company	2	\$10,688,023	2.0%	40
19275	American Family Mutual Insurance Company	0	\$10,132,324	1.9%	0
89184	Sterling Investors Life Insurance Company	0	\$9,736,719	1.8%	0
86355	Standard Life & Accident Insurance Company	5	\$9,159,468	1.7%	116
70815	Hartford Life & Accident Insurance Company	0	\$7,652,644	1.4%	0
60763	American Pioneer Life Insurance Company	13	\$5,970,841	1.1%	462
80578	Physicians Mutual Insurance Company	3	\$5,639,292	1.0%	113
78174	Conseco Health Insurance Company	10	\$5,430,713	1.0%	391
62146	Combined Insurance Co Of America	1	\$5,412,149	1.0%	39
86231	Transamerica Life Insurance Company	6	\$5,241,561	1.0%	243
62952	Equitable Life & Casualty Insurance Company	3	\$4,818,323	0.9%	132
65536	Genworth Life & Annuity Insurance Company	2	\$4,475,800	0.8%	95
70319	Washington National Insurance Co	5	\$3,584,723	0.7%	296
61271	Principal Life Insurance Company	1	\$3,526,829	0.7%	60
68462	Reserve National Insurance Company	1	\$3,225,267	0.6%	66
71773	American National Life Ins Co Of TX	1	\$2,961,447	0.5%	72
56014	Thrivent Financial For Lutherans	1	\$2,772,552	0.5%	77
71390	Admiral Life Insurance Company Of America	0	\$2,746,418	0.5%	0
62286	Golden Rule Insurance Company	1	\$2,614,742	0.5%	81
63479	United Teacher Associates Insurance Co	21	\$2,093,293	0.4%	2,129
72125	Physicians Life Insurance Company	0	\$1,871,562	0.3%	2,12)
64211	Guarantee Trust Life Insurance Co	1	\$1,683,186	0.3%	126
71404	Continental General Insurance Company	0	\$1,626,417	0.3%	0
69701	Union Bankers Insurance Company	0	\$1,619,832	0.3%	0
69132	State Mutual Insurance Company	1	\$1,590,466	0.3%	133
69663	USAA Life Insurance Company	0	\$1,479,578	0.3%	0
60682	Conseco Insurance Company	1	\$1,395,650	0.3%	152
70670	Health Care Service Corporation	0	\$1,243,253	0.2%	0
31119	Medico Insurance Company	1	\$1,190,087	0.2%	178
J/	Top 40 Writers	223	\$523,311,073	97.1%	
	Total	254	\$539,135,882	100.0%	•

	Life and Annuity Complaint Indices Top Forty Writers by Market Share					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006-2008	Average Market Share 2006- 2008	Complaint Index	
60941	AIG Sunamerica Life Assurance Company	3	\$424,515,410	5.9%	4	
65676	Lincoln National Life Insurance Company	18	\$373,441,584	5.2%	24	
62944	AXA Equitable Life Insurance Company	17	\$320,303,854	4.4%	26	
68136	Protective Life Insurance Company	14	\$277,224,806	3.8%	25	
65978	Metropolitan Life Insurance Company	59	\$254,613,364	3.5%	116	
70688	Transamerica Financial Life Ins Co	1	\$246,973,168	3.4%	2	
67091	Northwestern Mutual Life Insurance Company	8	\$204,768,867	2.8%	19	
90611	Allianz Life Insurance Co Of North America	43	\$186,824,507	2.6%	115	
65056	Jackson National Life Insurance Company	20	\$184,133,768	2.5%	54	
80942	ING USA Annuity & Life Ins Co	8	\$176,183,258	2.4%	23	
69345	Teachers Ins & Annuity Assn of America	0	\$166,416,496	2.3%	0	
91596	New York Life Insurance & Annuity Corporation	8	\$164,699,971	2.3%	24	
65005	Riversource Life Insurance Company	3	\$142,723,813	2.0%	10	
67466	Pacific Life Insurance Company	1	\$123,824,418	1.7%	4	
61050	Metlife Investors USA Insurance Company	3	\$125,824,418	1.6%	13	
69108	State Farm Life Insurance Company	15	\$115,424,109	1.6%	65	
86231	Transamerica Life Insurance Company	22	\$113,281,007	1.6%	97	
60895	American United Life Insurance Co	1		1.4%	5	
86630		7	\$102,560,925	1.4%	35	
	Prudential Annuities Life Assurance Corporation	1	\$100,994,598	1.4%	5	
86509	ING Life Insurance & Annuity Company		\$98,461,582		33	
65935	Massachusetts Mutual Life Insurance Company	6	\$91,096,977	1.3%		
68241	Prudential Insurance Company Of America The	37	\$88,357,602	1.2%	209	
68322	Great-West Life & Annuity Insurance Company	0	\$86,944,324	1.2%	0	
93513	Metlife Investors Insurance Company	0	\$81,208,296	1.1%	0	
60631	American Investors Life Ins Co	14	\$77,864,007	1.1%	90	
56014	Thrivent Financial For Lutherans	4	\$77,643,368	1.1%	26	
61689	Aviva Life & Annuity Company	19	\$75,478,265	1.0%	126	
79065	Sun Life Assurance Of Canada (US	3	\$74,143,798	1.0%	20	
61271	Principal Life Insurance Company	3	\$73,385,703	1.0%	20	
60488	American General Life Insurance Co	29	\$69,658,643	1.0%	208	
92738	American Equity Investment Life Ins Co	10	\$56,291,448	0.8%	89	
66915	New York Life Insurance Company	17	\$56,062,272	0.8%	151	
70238	Variable Annuity Life Insurance Company	3	\$55,483,818	0.8%	27	
79227	PRUCO Life Insurance Company	8	\$55,237,612	0.8%	72	
88072	Hartford Life Insurance Company	7	\$54,350,367	0.8%	64	
66168	Minnesota Life Insurance Company	4	\$53,731,491	0.7%	37	
60186	Allstate Life Insurance Company	10	\$53,534,546	0.7%	93	
70432	Western National Life Insurance Company	8	\$51,627,944	0.7%	77	
65536	Genworth Life & Annuity Insurance Company	11	\$51,027,873	0.7%	108	
63274	Om Financial Life Insurance Company	20	\$50,675,219	0.7%	197	
	Top 40 Writers	465	\$5,228,092,990	72.4%	<u> </u>	
	Total	1,449	\$7,226,024,847	100.0%		

	Health Maintenance Organization Complaint Indices (Excluding Medicare and Medicaid) by Market Share						
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index		
95358	HMO Missouri Inc DBA Anthem Blue Cross & Blue Shield	117	\$370,149,591	25.7%	110		
95315	Good Health HMO Inc DBA Blue-care Inc	54	\$241,079,218	16.7%	78		
96377	Group Health Plan Inc	61	\$221,761,737	15.4%	96		
95489	Coventry Health Care Of Kansas Inc	65	\$155,445,075	10.8%	146		
95309	Mercy Health Plans Of Missouri Inc	23	\$130,838,770	9.1%	61		
96385	United Healthcare Of The Midwest Inc	42	\$100,561,785	7.0%	146		
95885	Humana Health Plan Inc	22	\$56,121,091	3.9%	137		
47171	Blue Cross & Blue Shield Of Kansas City	0	\$50,717,580	3.5%	0		
95810	Aetna Health Inc	12	\$44,348,323	3.1%	94		
95145	Community Health Plan	7	\$32,690,032	2.3%	75		
95530	Cox Health Systems HMO Inc	5	\$19,788,232	1.4%	88		
95635	CIGNA Healthcare Of St Louis Inc	1	\$9,314,070	0.6%	37		
95209	CIGNA Healthcare of Ohio Inc	2	\$7,251,137	0.5%	96		
96475	Healthlink HMO Inc	0	\$685,423	0.0%	0		
10253	Great-West Healthcare Of KS/MO-Withdrew-	2			<u> </u>		
	Total	413	\$1,440,752,063	100.0%			

Complaint Indices

Top 40 Writers by Line

Alpha by Company

	Property and Casualty Complaint Indices (Excluding Accident and Health) Top Forty Writers, Alpha by Company				
Code	Name	Complaints 2006-2008	Average Annual Premium 2006-2008	Average Market Share 2006- 2008	Complaint Index
22667	Ace American Insurance Company	10	\$67,328,162	0.8%	23
20699	Ace Property & Casualty Insurance Company	0	\$72,680,441	0.9%	0
19232	Allstate Insurance Company	117	\$74,297,692	0.9%	243
17230	Allstate Property & Casualty Insurance Company	112	\$84,887,713	1.0%	204
19100	AMCO Insurance Company	36	\$62,717,242	0.8%	89
19275	American Family Mutual Insurance Company	568	\$794,528,265	9.5%	110
19380	American Home Assurance Company	30	\$76,935,826	0.9%	60
19283	American Standard Insurance Co of WI	87	\$72,110,014	0.9%	186
27235	Auto Club Family Insurance Company	81	\$47,068,671	0.6%	266
18988	Auto Owners Insurance Company	21	\$46,795,028	0.6%	69
15512	Automobile Club Inter-insurance Exchange	97	\$90,124,539	1.1%	166
15725	Cameron Mutual Insurance Company	43	\$48,701,511	0.6%	136
10677	Cincinnati Insurance Company The	15	\$78,354,321	0.9%	30
19410	Commerce & Industry Insurance Co	12	\$42,685,779	0.5%	43
20443	Continental Casualty Company	6	\$62,538,724	0.7%	15
35289	Continental Insurance Company The	3	\$161,423,623	1.9%	3
21326	Empire Fire & Marine Insurance Co	8	\$54,438,953	0.7%	23
21482	Factory Mutual Insurance Company	0	\$50,562,656	0.6%	0
26859	Farm Bureau Town & Country Ins Co Of MO	170	\$124,046,716	1.5%	212
21628	Farmers Insurance Company Inc	137	\$133,377,451	1.6%	159
20281	Federal Insurance Company Federal Insurance Company	4	\$80,415,669	1.0%	8
35882	GEICO General Ins Co	63	\$45,382,131	0.5%	214
22136	Great American Insurance Company Of NY	2	\$43,811,790	0.5%	7
19682	Hartford Fire Insurance Company	10	\$43,440,900	0.5%	36
30104	Hartford Underwriters Insurance Company	37	\$53,575,152	0.6%	107
23035	Liberty Mutual Fire Insurance Company	55	\$90,404,983	1.1%	94
21687	Mid Century Insurance Company	105	\$80,682,390	1.0%	201
23515	Midwestern Indemnity Company The	27	\$44,160,331	0.5%	94
10191	Missouri Employers Mutual Insurance Company	24	\$138,136,347	1.7%	27
11582	Missouri Professionals Mutual	3	\$41,308,384	0.5%	11
19445	National Union Fire Ins Co of Pittsburgh	7	\$71,559,614	0.9%	15
37834	Progressive Preferred Insurance Company	75	\$66,243,394	0.8%	175
24740	Safeco Insurance Company Of America	52	\$52,736,268	0.6%	152
39012	Safeco Insurance Company Of Illinois	156	\$123,074,110	1.5%	196
23388	* *	208		3.3%	117
	Shelter Mutual Insurance Company	301	\$275,293,006 \$468,862,444	5.6%	
25143 25178	State Farm Fire & Casualty Company State Farm Mutual Automobile Insurance Co	303	\$468,862,444 \$595,038,294	7.1%	99 79
25674	Travelers Prop Casualty Co of America	12	\$68,199,618	0.8%	27
25941	United Services Automobile Association	36	\$57,526,216 \$70,671,072	0.7%	97
16535	Zurich American Insurance Company	8	\$79,671,073	1.0%	16
	Top 40 Writers	3,041	\$4,765,125,441	57.0%	•
	Total	5,413	\$8,356,360,928	100.0%	•

Private Passenger Automobile Insurance Complaint Indices Top Forty Writers, Alpha by Company					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
42609	Affirmative Insurance Company	117	\$12,513,083	0.5%	863
42579	Allied Property & Casualty Insurance Company	16	\$27,347,665	1.0%	54
29688	Allstate Fire & Casualty Insurance Company	24	\$25,842,859	0.9%	86
19232	Allstate Insurance Company	66	\$46,926,155	1.7%	130
17230	Allstate Property & Casualty Insurance Company	71	\$56,155,762	2.0%	117
19100	AMCO Insurance Company	9	\$9,937,443	0.4%	84
19275	American Family Mutual Insurance Company	303	\$433,329,229	15.7%	65
28401	American National Property & Casualty Co	14	\$17,234,764	0.6%	75
19283	American Standard Insurance Co of WI	87	\$72,085,297	2.6%	111
27235	Auto Club Family Insurance Company	30	\$12,594,204	0.5%	220
15512	Automobile Club Inter-insurance Exchange	97	\$89,851,869	3.2%	100
15725	Cameron Mutual Insurance Company	19	\$18,273,739	0.7%	96
40371	Columbia Mutual Insurance Company	15	\$12,068,718	0.4%	115
10783	Cornerstone National Insurance Company	20	\$16,308,310	0.6%	113
21164	Dairyland Insurance Company	19	\$14,435,144	0.5%	121
25712	Esurance Insurance Company	36	\$15,695,459	0.5%	212
26859	Farm Bureau Town & Country Ins Co Of MO	61	\$55,292,699	2.0%	102
21628	Farmers Insurance Company Inc	136	\$133,377,451	4.8%	94
19852	Financial Indemnity Company	39	\$11,466,543	0.4%	314
35882	GEICO General Ins Co	63	\$45,382,117	1.6%	128
22055		35		0.8%	149
	GEICO Indemnity Company		\$21,731,436		
22063	Government Employees Insurance Co	26	\$18,963,091	0.7%	127
30104	Hartford Underwriters Insurance Company	23	\$16,032,246	0.6%	132
23035	Liberty Mutual Fire Insurance Company	24	\$27,786,037	1.0%	80
21687	Mid Century Insurance Company	43	\$31,831,056	1.1%	125
23515	Midwestern Indemnity Company The	13	\$15,595,845	0.6%	77
26093	Nationwide Affinity Insurance Co Of America	14	\$16,977,042	0.6%	76
16322	Progressive Direct Insurance Company	34	\$35,935,934	1.3%	87
24279	Progressive Max Insurance Company	34	\$31,332,396	1.1%	100
42919	Progressive Northwestern Insurance Company	46	\$28,943,545	1.0%	147
37834	Progressive Preferred Insurance Company	73	\$66,092,407	2.4%	102
34690	Property & Casualty Insurance Co of Hartford	21	\$13,256,836	0.5%	146
39012	Safeco Insurance Company Of Illinois	156	\$123,074,110	4.4%	117
23388	Shelter Mutual Insurance Company	86	\$145,341,596	5.2%	55
25143	State Farm Fire & Casualty Company	39	\$44,798,493	1.6%	80
25178	State Farm Mutual Automobile Insurance Co	297	\$576,526,936	20.8%	48
27998	Travelers Home & Marine Insurance Company	18	\$26,982,776	1.0%	62
29459	Twin City Fire Insurance Company	17	\$10,388,467	0.4%	151
25941	United Services Automobile Association	31	\$36,894,790	1.3%	78
25968	USAA Casualty Insurance Company	9	\$21,871,512	0.8%	38
	Top 40 Writers	2,281	\$2,436,475,062	88.0%	•
	Total	3,000	\$2,768,694,291	100.0%	•

	Homeowners Insurance Complaint Indices Top Forty Writers, Alpha by Company				
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
42579	Allied Property & Casualty Insurance Company	14	\$10,561,428	0.8%	114
19240	Allstate Indemnity Company	44	\$24,831,287	1.8%	153
19232	Allstate Insurance Company	44	\$20,011,586	1.4%	189
17230	Allstate Property & Casualty Insurance Company	38	\$27,546,469	2.0%	119
19100	AMCO Insurance Company	9	\$17,696,280	1.3%	44
21849	American Automobile Insurance Company	3	\$9,677,171	0.7%	27
19275	American Family Mutual Insurance Company	211	\$248,925,441	17.8%	73
28401	American National Property & Casualty Co	13	\$11,136,624	0.8%	101
42978	American Security Insurance Company	8	\$14,957,752	1.1%	46
27235	Auto Club Family Insurance Company	51	\$31,947,485	2.3%	138
18988	Auto Owners Insurance Company	10	\$15,530,174	1.1%	55
15725	Cameron Mutual Insurance Company	18	\$17,003,626	1.2%	91
10677	Cincinnati Insurance Company The	3	\$4,729,508	0.3%	55
40371	Columbia Mutual Insurance Company	3	\$4,959,654	0.4%	52
20990	Country Mutual Insurance Company	21	\$9,200,264	0.7%	197
21482	Factory Mutual Insurance Company	0	\$9,854,805	0.7%	0
26859	Farm Bureau Town & Country Ins Co Of MO	96	\$56,297,348	4.0%	147
21652	Farmers Insurance Exchange	26	\$9,559,611	0.7%	234
25180	Fidelity National Insurance Company	30	\$5,451,498	0.4%	474
21660	Fire Insurance Exchange	39	\$27,471,981	2.0%	122
11185	Foremost Insurance Company	20	\$8,553,062	0.6%	201
41513	Foremost Signature Insurance Company	5	\$4,849,614	0.3%	89
20303	Great Northern Insurance Company	0	\$7,946,875	0.6%	0
30104	Hartford Underwriters Insurance Company	12	\$8,562,037	0.6%	121
20419	Homesite Indemnity Company	39	\$5,281,305	0.4%	636
23035	Liberty Mutual Fire Insurance Company	19	\$19,372,896	1.4%	84
14400	Lititz Mutual Insurance Company	10	\$7,844,612	0.6%	110
21687	Mid Century Insurance Company	62	\$40,385,701	2.9%	132
23515	Midwestern Indemnity Company The	11	\$11,426,099	0.8%	83
23787	Nationwide Mutual Insurance Company	4	\$6,878,110	0.5%	50
24260	Progressive Casualty Insurance Company	19	\$5,639,822	0.4%	290
34690	Property & Casualty Insurance Co of Hartford	12	\$8,562,778	0.6%	121
24740	Safeco Insurance Company Of America	42	\$37,790,271	2.7%	96
23388		114	\$103,282,617	7.4%	95
	Shelter Mutual Insurance Company			1.8%	
19070	Standard Fire Insurance Company State Auto Proporty & Copyelly Insurance Co	45	\$25,879,122 \$5,359,641		150
25127	State Auto Property & Casualty Insurance Co	4	" ' '	0.4%	64
25143	State Farm Fire & Casualty Company	246	\$332,364,650	23.7%	64
27998	Travelers Home & Marine Insurance Company	11	\$8,597,556	0.6%	110
25941	United Services Automobile Association	5	\$17,925,101	1.3%	24
25968	USAA Casualty Insurance Company	2	\$8,697,838	0.6%	20
-	Top 40 Writers	1,363	\$1,252,549,697	89.4%	•
	Total	1,627	\$1,401,697,926	100.0%	•

Accident and Health Insurance Complaint Indices Top Forty Writers, Alpha by Company					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006-	Complaint Index
			*	2008	
60054	Aetna Life Insurance Company	45	\$135,917,059	2.2%	61
60305	American Community Mutual Insurance Co	79	\$42,753,793	0.7%	340
60380	American Family Life Assurance Co of Col.	41	\$76,529,199	1.2%	99
19275	American Family Mutual Insurance Company	13	\$32,486,788	0.5%	74
60836	American Republic Insurance Company	16	\$31,052,930	0.5%	95
28207	Anthem Insurance Companies Inc	0	\$37,068,185	0.6%	0
61263	Bankers Life & Casualty Company	79	\$44,079,539	0.7%	330
47171	Blue Cross & Blue Shield Of Kansas City	190	\$568,651,022	9.0% 0.4%	61
62146 62308	Combined Insurance Co Of America Connecticut General Life Ins Co	18	\$22,251,364	0.4%	149
68500	Continental Life Ins Co Of Brentwood TN	20	\$55,499,646 \$22,748,618	0.4%	66 49
81973	Coventry Health & Life Insurance Company	6	\$22,748,618	5.2%	49
60040	Cox Health Systems Insurance Company	85 32	\$326,837,780 \$56,786,485	0.9%	40 104
13935	Federated Mutual Insurance Company	8	\$20,988,686	0.3%	70
90328	First Health Life & Health Insurance Company	1	\$53,643,790	0.5%	3
70025	Genworth Life Insurance Company	13	\$33,670,196	0.5%	71
62286	Golden Rule Insurance Company	52	\$48,791,451	0.8%	196
64246	Guardian Life Insurance Company Of America	21	\$62,425,799	1.0%	62
70815	Hartford Life & Accident Insurance Company	13	\$57,346,627	0.9%	42
78972	Healthy Alliance Life Insurance Company	1,090	\$1,497,904,678	23.7%	134
73288	Humana Insurance Company	59	\$342,099,675	5.4%	32
65099	John Hancock Life Insurance Company	8	\$23,064,111	0.4%	64
11529	Mercy Health Plans	53	\$190,137,164	3.0%	51
65978	Metropolitan Life Insurance Company	20	\$85,202,509	1.4%	43
71412	Mutual Of Omaha Insurance Company	26	\$54,074,440	0.9%	88
19445	National Union Fire Ins Co of Pittsburgh	18	\$116,766,767	1.9%	28
67660	Pennsylvania Life Insurance Company	5	\$42,251,602	0.7%	22
61271	Principal Life Insurance Company	51	\$79,563,488	1.3%	118
69019	Standard Insurance Company	15	\$33,054,119	0.5%	83
25178	State Farm Mutual Automobile Insurance Co	2	\$31,536,564	0.5%	12
69477	Time Insurance Company	94	\$44,814,968	0.7%	386
86231	Transamerica Life Insurance Company	37	\$25,604,546	0.4%	266
80314	Unicare Life & Health Insurance Company	16	\$29,596,823	0.5%	99
70408	Union Security Insurance Company	14	\$31,541,234	0.5%	82
92916	United American Insurance Company	68	\$25,472,261	0.4%	491
79413	United Healthcare Insurance Company	331	\$936,155,061	14.8%	65
62235	Unum Life Insurance Company Of America	29	\$51,947,754	0.8%	103
32395	Vision Service Plan Insurance Company	1	\$27,640,989	0.4%	7
10155	Wellcare Prescription Insurance Inc	1	\$23,229,516	0.4%	8
16535	Zurich American Insurance Company	3	\$19,648,536	0.3%	28
	Top 40 Writers	2,673	\$5,440,835,760	86.2%	•
	Total	3,431	\$6,309,213,882	100.0%	•

Long Term Care Insurance Complaint Indices Top Forty Writers, Alpha by Company					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006-2008	Complaint Index
90611	Allianz Life Insurance Co Of North America	0	\$5,115,481	2.3%	0
19275	American Family Mutual Insurance Company	0	\$815,238	0.4%	0
60534	American Heritage Life Insurance Company	2	\$997,426	0.5%	188
60836	American Republic Insurance Company	1	\$982,871	0.4%	96
61263	Bankers Life & Casualty Company	54	\$19,632,380	8.9%	258
47171	Blue Cross & Blue Shield Of Kansas City	1	\$748,661	0.3%	125
20443	Continental Casualty Company	6	\$6,735,128	3.1%	84
71404	Continental General Insurance Company	1	\$981,207	0.4%	96
62952	Equitable Life & Casualty Insurance Company	10	\$8,664,050	3.9%	108
70025	Genworth Life Insurance Company	13	\$33,513,836	15.3%	36
64211	Guarantee Trust Life Insurance Co	1	\$880,219	0.4%	107
65099	John Hancock Life Insurance Company	8	\$22,942,304	10.4%	33
58033	Knights Of Columbus	0	\$1,467,719	0.7%	0
65595	Lincoln Benefit Life Company	2	\$4,703,348	2.1%	40
65935	Massachusetts Mutual Life Insurance Company	0	\$1,543,868	0.7%	0
31119	Medico Insurance Company	5	\$3,337,248	1.5%	141
71471	Medico Life Insurance Company	0	\$975,841	0.4%	0
87726	Metlife Insurance Company Of Connecticut	2	\$1,741,920	0.8%	108
65978	Metropolitan Life Insurance Company	4	\$20,074,935	9.1%	19
71412	Mutual Of Omaha Insurance Company	1	\$5,291,541	2.4%	18
60593	National States Insurance Company	2	\$868,137	0.4%	216
66915	New York Life Insurance Company	0	\$2,818,850	1.3%	0
69000	Northwestern Long Term Care Insurance Co	0	\$2,796,647	1.3%	0
63282	Penn Treaty Network America Ins Co-Suspended-	5	\$2,737,664	1.2%	171
80578	Physicians Mutual Insurance Company	0	\$1,010,762	0.5%	0
68195	Provident Life & Accident Insurance Company	0	\$724,844	0.3%	0
68241	Prudential Insurance Company Of America The	0	\$2,973,742	1.4%	0
65005	Riversource Life Insurance Company	1	\$3,893,998	1.8%	24
76325	Senior Health Insurance Company of PA	46	\$6,282,813	2.9%	687
25178	State Farm Mutual Automobile Insurance Co	0	\$5,173,734	2.4%	0
69116	State Life Insurance Company	0	\$930,055	0.4%	0
65021	Stonebridge Life Insurance Company	18	\$2,217,325	1.0%	762
56014	Thrivent Financial For Lutherans	0	\$7,402,156	3.4%	0
69477	Time Insurance Company	0	\$1,695,559	0.8%	0
86231	Transamerica Life Insurance Company	22	\$12,114,873	5.5%	171
70408	Union Security Insurance Company	0	\$1,692,418	0.8%	0
92916	United American Insurance Company	2	\$838,632	0.4%	224
42129	United Security Assurance Company Of PA	0	\$699,515	0.3%	0
62235	Unum Life Insurance Company Of America	1	\$9,690,222	4.4%	10
70319	Washington National Insurance Co	7	\$1,166,649	0.5%	563
	Top 40 Writers	215	\$208,873,816	95.1%	•
	Total	234	\$219,719,269	100.0%	•

Medicare Supplement Insurance Complaint Indices Top Forty Writers, Alpha by Company					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
71390	Admiral Life Insurance Company Of America	0	\$2,746,418	0.5%	0
19275	American Family Mutual Insurance Company	0	\$10,132,324	1.9%	0
71773	American National Life Ins Co Of TX	1	\$2,961,447	0.5%	72
60763	American Pioneer Life Insurance Company	13	\$5,970,841	1.1%	462
60836	American Republic Insurance Company	6	\$24,640,614	4.6%	52
61263	Bankers Life & Casualty Company	19	\$21,363,775	4.0%	189
47171	Blue Cross & Blue Shield Of Kansas City	15	\$27,387,217	5.1%	116
61859	Christian Fidelity Life Insurance Co	1	\$17,488,424	3.2%	12
62146	Combined Insurance Co Of America	1	\$5,412,149	1.0%	39
78174	Conseco Health Insurance Company	10	\$5,430,713	1.0%	391
60682	Conseco Insurance Company	1	\$1,395,650	0.3%	152
71404	Continental General Insurance Company	0	\$1,626,417	0.3%	0
68500	Continental Life Ins Co Of Brentwood TN	5	\$21,786,052	4.0%	49
62952	Equitable Life & Casualty Insurance Company	3	\$4,818,323	0.9%	132
65536	Genworth Life & Annuity Insurance Company	2	\$4,475,800	0.8%	95
62286	Golden Rule Insurance Company	1	\$2,614,742	0.5%	81
64211	Guarantee Trust Life Insurance Co	1	\$1,683,186	0.3%	126
70815	Hartford Life & Accident Insurance Company	0	\$7,652,644	1.4%	0
70670	Health Care Service Corporation	0	\$1,243,253	0.2%	0
78972	Healthy Alliance Life Insurance Co	66	\$81,527,706	15.1%	172
31119	Medico Insurance Company	1	\$1,190,087	0.2%	178
71412	Mutual Of Omaha Insurance Company	11	\$35,016,678	6.5%	67
72125	Physicians Life Insurance Company	0	\$1,871,562	0.3%	0
80578	Physicians Mutual Insurance Company	3	\$5,639,292	1.0%	113
61271	Principal Life Insurance Company	1	\$3,526,829	0.7%	60
68462	Reserve National Insurance Company	1	\$3,225,267	0.6%	66
57657	Royal Neighbors Of America	0	\$10,688,704	2.0%	0
86355	Standard Life & Accident Insurance Company	5	\$9,159,468	1.7%	116
25178	State Farm Mutual Automobile Insurance Co	0	\$10,734,039	2.0%	0
69132	State Mutual Insurance Company	1	\$1,590,466	0.3%	133
89184	Sterling Investors Life Insurance Company	0	\$9,736,719	1.8%	0
56014	Thrivent Financial For Lutherans	1	\$2,772,552	0.5%	77
86231	Transamerica Life Insurance Company	6	\$5,241,561	1.0%	243
69701	Union Bankers Insurance Company	0	\$1,619,832	0.3%	0
92916	United American Insurance Company	2	\$10,688,023	2.0%	40
79413	United Healthcare Insurance Company	16	\$137,278,700	25.5%	25
63479	United Teacher Associates Insurance Co	21	\$2,093,293	0.4%	2,129
72850	United World Life Insurance Company	4	\$13,816,007	2.6%	61
69663	USAA Life Insurance Company	0	\$1,479,578	0.3%	0
70319	Washington National Insurance Co	5	\$3,584,723	0.7%	296
	Top 40 Writers	223	\$523,311,073	97.1%	•
	Total	254	\$539,135,882	100.0%	•

Life and Annuity Complaint Indices Top Forty Writers, Alpha by Company					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
60941	AIG Sunamerica Life Assurance Company	3	\$424,515,410	5.9%	4
90611	Allianz Life Insurance Co Of North America	43	\$186,824,507	2.6%	115
60186	Allstate Life Insurance Company	10	\$53,534,546	0.7%	93
92738	American Equity Investment Life Ins Co	10	\$56,291,448	0.8%	89
60488	American General Life Insurance Co	29	\$69,658,643	1.0%	208
60631	American Investors Life Ins Co	14	\$77,864,007	1.1%	90
60895	American United Life Insurance Co	1	\$102,560,925	1.4%	5
61689	Aviva Life & Annuity Company	19	\$75,478,265	1.0%	126
62944	AXA Equitable Life Insurance Company	17	\$320,303,854	4.4%	26
65536	Genworth Life & Annuity Insurance Company	11	\$51,027,873	0.7%	108
68322	Great-West Life & Annuity Insurance Company	0	\$86,944,324	1.2%	0
88072	Hartford Life Insurance Company	7	\$54,350,367	0.8%	64
86509	ING Life Insurance & Annuity Company	1	\$98,461,582	1.4%	5
80942	ING USA Annuity & Life Ins Co	8	\$176,183,258	2.4%	23
65056	Jackson National Life Insurance Company	20	\$184,133,768	2.5%	54
65676	Lincoln National Life Insurance Company	18	\$373,441,584	5.2%	24
65935	Massachusetts Mutual Life Insurance Company	6	\$91,096,977	1.3%	33
93513	Metlife Investors Insurance Company	0	\$81,208,296	1.1%	0
61050	Metlife Investors USA Insurance Company	3	\$116,919,914	1.6%	13
65978	Metropolitan Life Insurance Company	59	\$254,613,364	3.5%	116
66168	Minnesota Life Insurance Company	4	\$53,731,491	0.7%	37
91596	New York Life Insurance & Annuity Corporation	8	\$164,699,971	2.3%	24
66915	New York Life Insurance Company	17	\$56,062,272	0.8%	151
67091	Northwestern Mutual Life Insurance Company	8	\$204,768,867	2.8%	19
63274	Om Financial Life Insurance Company	20	\$50,675,219	0.7%	197
67466	Pacific Life Insurance Company	1	\$123,824,418	1.7%	4
61271	Principal Life Insurance Company	3	\$73,385,703	1.0%	20
68136	Protective Life Insurance Company	14	\$277,224,806	3.8%	25
79227	PRUCO Life Insurance Company	8	\$55,237,612	0.8%	72
86630	Prudential Annuities Life Assurance Corporation	7	\$100,994,598	1.4%	35
68241	Prudential Insurance Company Of America The	37	\$88,357,602	1.2%	209
65005	Riversource Life Insurance Company	3	\$142,723,813	2.0%	10
69108	State Farm Life Insurance Company	15	\$115,424,109	1.6%	65
79065	Sun Life Assurance Of Canada (US	3	\$74,143,798	1.0%	20
69345	Teachers Ins & Annuity Assn of America	0	\$166,416,496	2.3%	0
56014	Thrivent Financial For Lutherans	4	\$77,643,368	1.1%	26
70688	Transamerica Financial Life Ins Co	1	\$246,973,168	3.4%	2
86231	Transamerica Life Insurance Company	22	\$113,281,007	1.6%	97
70238	Variable Annuity Life Insurance Company	3	\$55,483,818	0.8%	27
70432	Western National Life Insurance Company	8	\$51,627,944	0.7%	77
	Top 40 Writers	465	\$5,228,092,990	72.4%	<u> </u>
	Total	1,449	\$7,226,024,847	100.0%	

	Health Maintenance Organization Complaint Indices (Excluding Medicare and Medicaid) Alpha by Company						
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index		
95810	Aetna Health Inc	12	\$44,348,323	3.1%	94		
47171	Blue Cross & Blue Shield Of Kansas City	0	\$50,717,580	3.5%	0		
95209	CIGNA Healthcare of Ohio Inc	2	\$7,251,137	0.5%	96		
95635	CIGNA Healthcare Of St Louis Inc	1	\$9,314,070	0.6%	37		
95145	Community Health Plan	7	\$32,690,032	2.3%	75		
95489	Coventry Health Care Of Kansas Inc	65	\$155,445,075	10.8%	146		
95530	Cox Health Systems HMO Inc	5	\$19,788,232	1.4%	88		
95315	Good Health HMO Inc DBA Blue-care Inc	54	\$241,079,218	16.7%	78		
10253	Great-West Healthcare Of KS/MO-Withdrew-	2					
96377	Group Health Plan Inc	61	\$221,761,737	15.4%	96		
96475	Healthlink HMO Inc DBA Healthlink HMO	0	\$685,423	0.0%	0		
95358	HMO Missouri Inc DBA Anthem Blue Cross & Blue Shield	117	\$370,149,591	25.7%	110		
95885	Humana Health Plan Inc	22	\$56,121,091	3.9%	137		
95309	Mercy Health Plans Of Missouri Inc	23	\$130,838,770	9.1%	61		
96385	United Healthcare Of The Midwest Inc	42	\$100,561,785	7.0%	146		
	Total	413	\$1,440,752,063	100.0%			

All Property and Casualty Writers

(Excluding Accident and Health)

Complaint Indices

Property and Casualty Insurance Complaint Indices (Excluding Accident and Health) Alpha by Company Code Name Complaint **Complaints** Average Annual Average 2006-2008 Premium 2006-Market Index 2008 Share 2006-2008 44725 0 \$25,295 0.0%0 1st Auto & Casualty Insurance Company 12963 0 \$882,812 0.0%0 21st Century Insurance Company 22896 ACA Financial Guaranty Corporation 0 \$263,380 0.0%0 0.0%1 10349 Acceptance Casualty Insurance Co \$2,357,704 65 Acceptance Indemnity Insurance Co 0 0.0%20010 \$2,817 0 12304 Accident Fund General Insurance Company 0 \$1,137,218 0.0%0 2 Accident Fund Ins Co Of America 0.3% 12 10166 \$26,182,461 1 12305 Accident Fund National Insurance Company \$4,851,819 0.1% 32 0 0 11573 Accident Insurance Company Inc \$2,279 0.0%0 0.0%0 26379 Accredited Surety & Casualty Company Inc. \$28,490 22667 Ace American Insurance Company 10 \$67,328,162 0.8%23 20702 Ace Fire Underwriters Insurance Company 1 \$3,255,154 0.0%47 20699 Ace Property & Casualty Insurance Company 0 \$72,680,441 0.9% 0 19984 ACIG Insurance Company 0 \$299,445 0.0%0 22950 Acstar Insurance Company 0 \$115,575 0.0%0 14184 Acuity A Mutual Insurance Company 4 \$31,537,094 0.4%20 10324 Addison Insurance Company 2 0.1%36 \$8,463,354 40517 Advantage Workers Compensation Ins Co 0 0 \$19,586 0.0%0 0 33898 Aegis Security Insurance Company \$159,823 0.0%0 0 10014 Affiliated FM Insurance Company \$12,280,903 0.1%117 1,443 42609 Affirmative Insurance Company \$12,513,083 0.1% 22837 AGCS Marine Insurance Company 0 \$939 0.0%0 42757 Agri General Insurance Company 1 \$20,067,976 0.2%8 0 25232 AIG Advantage Insurance Company 0 \$181,872 0.0%0 0 19402 **AIG Casualty Company** \$2,919,297 0.0%34789 AIG Centennial Insurance Company 4 \$2,441,087 0.0%253 36587 AIG National Insurance Company Inc 27 \$7,401,663 0.1% 563 20796 AIG Premier Insurance Company 0 \$1,420,490 0.0%0 3 202 19399 AIU Insurance Company \$2,296,522 0.0%Alaska National Insurance Company 0 \$79,986 0.0%0 38733 \$163,627 24899 Alea North America Insurance Company 0 0.0%0 794 12188 Alfa Vision Insurance Corporation 26 \$5,055,400 0.1% 13285 Allegheny Casualty Company 0 \$241,056 0.0%0 19186 Alliance Insurance Company Inc 5 0.0%302 \$2,559,753 Allianz Global Risks US Insurance Company 35300 0 0.1% \$8,827,327 0 42579 Allied Property & Casualty Insurance Company 33 \$38,944,290 0.5% 131 10690 Allied World National Assurance Company 0 \$2,435,479 0.0%0 0 0 22730 Allied World Reinsurance Company \$1,314 0.0%0 41840 Allmerica Financial Benefit Insurance Company 0 \$14,790 0.0%29688 Allstate Fire & Casualty Insurance Company 24 \$25,842,859 0.3% 143

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Allstate Indemnity Company

Allstate Insurance Company

Allstate Property & Casualty Insurance Company

Alpha Property & Casualty Insurance Co

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Property and Casualty Insurance Complaint Indices (Excluding Accident and Health) Alpha by Company Code Name **Complaints** Average Annual Average Complaint 2006-2008 Premium 2006-Market Index 2008 Share 2006-2008 18708 AMBAC Assurance Corporation 0 \$6,892,607 0.1% 0 19100 **AMCO Insurance Company** 36 \$62,717,242 0.8%89 \$775,953 25402 AMCOMP Assurance Corporation 0 0.0%0 10346 AMCOMP Preferred Insurance Company 0 \$278 0.0%0 12548 American Agri-business Insurance Company 0 \$13,011,391 0.2%0 10103 American Agricultural Insurance Co 0 \$3,561,413 0.0%0 American Alternative Insurance Corporation 2 0.1% 25 19720 \$12,271,567 American Automobile Insurance Company 3 \$15,848,696 29 21849 0.2%American Bankers Insurance Company Of FL 129 10111 16 \$19,082,499 0.2%20427 American Casualty Company Of Reading PA 1 \$7,028,773 0.1% 22 0 19941 American Commerce Insurance Company 0 \$134,896 0.0%45934 American Compensation Insurance Company 0 \$308,249 0.0%0 10216 American Contractors Indemnity Company 0 0.0%0 \$526,887 19690 American Economy Insurance Company 6 \$9,147,076 0.1%101 23450 American Family Home Insurance Company 5 \$3,935,194 0.0%196 19275 American Family Mutual Insurance Company 568 \$794,528,265 9.5% 110 0.0%37931 American Farmers & Ranchers Insurance Co 0 \$303,739 0 10170 American Federated Insurance Company 0 \$234,059 0.0%0 24066 American Fire & Casualty Company 0 \$3,522,702 0.0%0 24376 American General Indemnity Company 0 \$503,396 0.0%0 American Guarantee & Liability Insurance Co 0 \$25,396,140 0.3% 0 26247 43494 American Hallmark Insurance Company Of TX 0 \$63,785 0.0%0 American Hardware Mutual Insurance Company 0 0.0%0 13331 \$11,398 19380 American Home Assurance Company 30 \$76,935,826 0.9% 60 21857 American Insurance Company The \$7,013,058 0.1% 22 1 32220 American International Insurance Company 0 \$5,330,870 0.1% 0 40258 American International South Insurance Co 26 \$7,456,963 0.1%538 31895 American Interstate Insurance Company 1 \$7,205,176 0.1% 21 American Mercury Insurance Company 0 0.0%0 16810 \$223,902 23469 American Modern Home Insurance Co 11 \$9,705,923 0.1%175 American Modern Select Insurance Company \$1,411,972 38652 2 0.0%219 22918 American Motorists Insurance Company 0 \$3,939 0.0%0 2 \$1,112,908 277 39942 American National General Insurance Company 0.0%28401 American National Property & Casualty Co 30 \$35,280,305 0.4% 131 19615 American Reliable Insurance Company 4 \$2,073,608 0.0%298 American Road Insurance Company 0 \$5,975,465 0.1% 0 19631 39969 American Safety Casualty Insurance Company 0 0 \$62,576 0.0%42978 American Security Insurance Company 9 \$15,377,209 0.2%90 42897 American Service Insurance Company 12 \$1,185,645 0.0%1,562 41998 American Southern Home Insurance Company 0 \$36,170 0.0%0 10235 American Southern Insurance Company 0 \$57,769 0.0%0 19283 American Standard Insurance Co of WI 87 \$72,110,014 0.9%186 19704 American States Insurance Company 8 \$14,356,299 0.2%86 31380 American Surety Company 0 \$8,755 0.0%0 40142 American Zurich Insurance Company 0 \$10,516,014 0.1%0

Property and Casualty Insurance Complaint Indices (Excluding Accident and Health) Alpha by Company Code Name **Complaints** Average Annual Complaint Average 2006-2008 Premium 2006-Market Index 2008 Share 2006-2008 19488 Amerisure Insurance Company 0 \$19,730,312 0.2%0 23396 Amerisure Mutual Insurance Company 1 0.3% 7 \$21,540,245 27928 Amex Assurance Company 2 0.0%142 \$2,177,720 0.0%AMICA Mutual Insurance Company 1 19976 \$3,738,467 41 ARAG Insurance Company 0 0.0%0 34738 \$122,489 11150 Arch Insurance Company 1 \$11,531,547 0.1%13 Argonaut Great Central Insurance Co 1 0.1% 17 19860 \$9,131,095 0 19801 Argonaut Insurance Company \$1,382,888 0.0%0 0 0 19828 Argonaut Midwest Insurance Company \$1,388,968 0.0%Armed Forces Insurance Exchange 3 0.0%254 41459 \$1,824,428 10194 Artisan & Truckers Casualty Company 1 \$3,469,497 0.0%44 21865 Associated Indemnity Corporation 1 \$828,316 0.0%186 19305 Assurance Company Of America 11 \$9,600,468 0.1% 177 30180 Assured Guaranty Corp 0 \$1,852,493 0.0%0 41769 Athena Assurance Company 0 \$154,400 0.0%0 19895 Atlantic Mutual Insurance Company-Suspended-1 \$680,524 0.0%227 Atlantic Specialty Insurance Company 0 0.0%0 27154 \$1,320,458 25422 Atradius Trade Credit Insurance Inc 0 0.0%0 \$1,450,109 0 0 13412 Austin Mutual Insurance Company \$3,426,125 0.0%81 27235 Auto Club Family Insurance Company \$47,068,671 0.6%266 21 18988 Auto Owners Insurance Company \$46,795,028 0.6% 69 97 Automobile Club Inter-insurance Exchange 15512 \$90,124,539 1.1% 166 19062 Automobile Ins Co Of Hartford CT 6 \$4,796,597 0.1% 193 10367 Avemco Insurance Company 0 \$836,357 0.0%0

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AXA Art Insurance Corporation

AXA Insurance Company

Axis Insurance Company

Bancinsure Inc

Axis Reinsurance Company

Balboa Insurance Company

Bankers Insurance Company

BCS Insurance Company

Beazley Insurance Company Inc

Benchmark Insurance Company

Bituminous Casualty Corporation

Bituminous Fire & Marine Ins Co

Bristol West Insurance Company

Brotherhood Mutual Insurance Co

Bond Safeguard Insurance Company

Berkley Regional Insurance Company

Bloomington Compensation Insurance Company

Bankers Standard Insurance Company

Bar Plan Mutual Insurance Company The

Bar Plan Surety & Fidelity Company, The

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Property and Casualty Insurance Complaint Indices (Excluding Accident and Health) Alpha by Company Code Name **Complaints** Average Annual Average Complaint 2006-2008 Premium 2006-Market Index 2008 Share 2006-2008 California Casualty General Ins Co of Oregon 35955 0 \$1,700,146 0.0%0 7 20117 California Casualty Indemnity Exchange \$2,047,775 0.0%528 California Casualty Insurance Company 0 20125 \$438 0.0%0 15725 Cameron Mutual Insurance Company 43 \$48,701,511 0.6% 136 42498 Cameron National Insurance Company 0 \$5,349,667 0.1% 0 36340 Camico Mutual Insurance Company 0 \$735,946 0.0%0 0.1% 10464 Canal Insurance Company 11 \$4,960,385 342 Capital City Insurance Company Inc \$197,720 30589 0 0.0%0 Capitol Indemnity Corporation 2 145 10472 \$2,126,874 0.0%Carolina Casualty Insurance Company 10510 6 \$8,986,696 0.1%103 \$13,586,796 11255 Caterpillar Insurance Company 0 0.2%0 19518 Catlin Insurance Company Inc 0 \$78,201 0.0%0 \$407,554 0 19909 Centennial Insurance Company-Suspended-0 0.0%34274 Central States Indemnity Company Of Omaha 0 \$1,783,379 0.0%0 42765 Centurion Casualty Company 0 \$6,312 0.0%0 \$22,806 0 26905 Century-national Insurance Company 0 0.0%37524 Charter Indemnity Company 1 \$686,521 0.0%225 25615 Charter Oak Fire Insurance Co The 6 \$13,214,415 0.2%70 10642 Cherokee Insurance Company \$3,876,695 0.0%40 1 0 \$1,509,735 0.0%0 22810 Chicago Insurance Company 10499 Chrysler Insurance Company 0 \$2,519,199 0.0%0 12777 Chubb Indemnity Insurance Company 0 \$2,777,548 0.0%0 0 Chubb National Insurance Company 0 \$1,416,145 0.0%10052 10669 Church Insurance Co The 0 \$792 0.0%0 18767 Church Mutual Insurance Company 2 \$19,964,103 0.2%15 0 25771 CIFG Assurance North America Inc-Suspended-\$27,945 0.0%0 \$900 0 22004 CIM Insurance Corporation 0 0.0%2 32 28665 Cincinnati Casualty Company The \$9,653,620 0.1% Cincinnati Indemnity Company Inc 0 0 23280 \$5,382,808 0.1%\$78,354,321 10677 Cincinnati Insurance Company The 15 0.9%30 Citizens Insurance Company Of America \$257,640 0.0%0 31534 0 Civic Property & Casualty Co 8 \$2,048,598 0.0%603 10315 Clarendon National Insurance Company 20532 1 \$1,376,642 0.0%112 25070 Clearwater Insurance Company 0 \$72,516 0.0%0 0 29114 CMG Mortgage Assurance Company 0 \$893 0.0%CMG Mortgage Insurance Company 0 \$1,674,155 0.0%0 40266 \$63,962 CNL Insurance America Inc 0 30112 0 0.0%34347 Colonial American Casualty & Surety C 0 \$779,907 0.0%0 10758 Colonial Surety Company 0 \$18,287 0.0%0 27812 Columbia Insurance Company 0 \$471 0.0%0 40371 Columbia Mutual Insurance Company 23 \$32,933,072 0.4%108 19640 Columbia National Insurance Company 5 \$13,821,430 0.2%56 19410 Commerce & Industry Insurance Co 12 \$42,685,779 0.5%43 10220 Commonwealth Ins Co Of America 0 \$763,651 0.0%0 12157 Companion Property & Casualty Insurance Co 0 \$115,659 0.0%0

Property and Casualty Insurance Complaint Indices (Excluding Accident and Health) Alpha by Company Code Name **Complaints** Average Annual Complaint Average 2006-2008 Premium 2006-Market Index 2008 Share 2006-2008 34711 Computer Insurance Company 0 \$191,789 0.0%0 10204 Consumers Insurance USA Inc 29 0.1% 417 \$10,748,346 20443 Continental Casualty Company 6 0.7%15 \$62,538,724 0 0.0%0 28258 Continental Indemnity Company \$592,323 Continental Insurance Company The 3 1.9% 3 35289 \$161,423,623 10804 Continental Western Insurance Company 11 \$40,073,507 0.5%42 37206 Contractors Bonding & Insurance Company 0 \$663,937 0.0%0 0 0 16411 Cooperative Mutual Insurance Company \$1,229,324 0.0%21 10783 Cornerstone National Insurance Company \$16,542,020 0.2%196 Country Casualty Insurance Company 0 0.0%0 20982 \$586,416 20990 Country Mutual Insurance Company 30 \$15,802,538 0.2%293 7 21008 Country Preferred Insurance Company \$7,044,123 0.1% 153 26492 Courtesy Insurance Company 0 \$714,560 0.0%0 30082 **CPA Insurance Company** 0 \$59,794 0.0%0 31348 Crum & Forster Indemnity Company 0 \$449,721 0.0%0 10847 Cumis Insurance Society Inc 0 \$5,940,321 0.1%0 Dairyland Insurance Company 19 0.2%203 21164 \$14,435,144 34924 Dakota Truck Underwriters 0 0.0%0 \$263,888 Dallas National Insurance Company 0 32271 0 \$217,544 0.0%0 0.0%0 16624 Darwin National Assurance Company \$601,706 2 0.0%522 16705 Dealers Assurance Company \$591,122 2 0.0%847 37907 Deerbrook Insurance Company \$364,700 37184 Deerfield Insurance Company 0 \$24,742 0.0%0 0 0 35408 Delos Insurance Company \$52,542 0.0%0 0 18813 Dentists Benefits Insurance Company \$6,158 0.0%94 42587 Depositors Insurance Company 10 \$16,340,288 0.2%12718 Developers Surety & Indemnity Company 0 \$336,652 0.0%0 10659 Diamond Insurance Company 1 \$372,888 0.0%414 Diamond State Insurance Company 2 \$1,587,392 0.0%42048 194 42781 Direct General Insurance Company 24 \$4,199,284 0.1%882 23736 Direct National Insurance Company 6 \$1,674,445 0.0%553 36463 Discover Property & Casualty Ins Co 10 \$13,186,299 0.2%117 34495 Doctors Company An Interinsurance Exchange 0 \$4,765,487 0.1% 0 22926 Economy Fire & Casualty Company 0 0.0%0 \$58 40649 Economy Premier Assurance Company 8 \$7,419,979 0.1% 166 21261 Electric Insurance Company 4 \$8,140,559 0.1%76 21407 0 0.0%Emcasco Insurance Company \$3,297,113 0 Empire Fire & Marine Insurance Co 8 0.7%23 21326 \$54,438,953 0 0 20648 **Employers Fire Insurance Company** \$3,782,907 0.0%0 0 21458 Employers Insurance Company Of Wausau \$7,731,463 0.1%3 28 21415 **Employers Mutual Casualty Company** \$16,804,776 0.2%**Employers Security Insurance Company** 0 0.0%0 32005 \$23,807 15130 **Encompass Indemnity Company** 14 \$7,670,905 0.1% 282

4

\$3,720,682

10071

Encompass Insurance Company Of America

166

0.0%

Property and Casualty Insurance Complaint Indices (Excluding Accident and Health) Alpha by Company Code Name **Complaints** Average Annual Average Complaint 2006-2008 Premium 2006-Market Index 2008 Share 2006-2008 37915 Essentia Insurance Company 0 \$501,901 0.0%0 25712 Esurance Insurance Company 36 \$15,747,509 0.2%353 20516 Euler Hermes American Credit Indemnity Co 0 \$1,670,386 0.0%0 Everest National Insurance Company 0 0.0%0 10120 \$3,346,507 12750 Evergreen National Indemnity Company 0 \$998,629 0.0%0 10318 Exact Property & Casualty 0 \$29,541 0.0%0 Excess Share Insurance Corporation 0 0.0%0 10003 \$89,659 Executive Risk Indemnity Inc 0 35181 0 \$5,402,691 0.1% Factory Mutual Insurance Company \$50,562,656 0 21482 0 0.6%0 44784 Fairfield Insurance Company 0 \$4,616 0.0%Fairmont Specialty Insurance Company 179 24384 1 \$861,548 0.0%12345 Farm Bureau New Horizons Ins Co of MO 0 \$989,175 0.0%0 1.5%Farm Bureau Town & Country Ins Co Of MO 170 26859 \$124,046,716 212 19194 Farmers Alliance Mutual Insurance Company 17 \$9,028,189 0.1%291 21628 Farmers Insurance Company Inc 137 \$133,377,451 1.6% 159 27 0.2%224 21652 Farmers Insurance Exchange \$18,636,756 13897 Farmers Mutual Hail Insurance Company Of IA 0 0.2%0 \$16,112,859 16381 Farmers Union Cooperative Insurance Company 2 \$428,353 0.0%721 41483 Farmington Casualty Company 0 \$3,581,593 0.0%0 0.0%Farmland Mutual Insurance Company 1 \$3,089,295 50 13838 FCCI Insurance Company 0 0.0%0 10178 \$1,692 20281 Federal Insurance Company 4 \$80,415,669 1.0% 8 Federated Mutual Insurance Company 4 0.3% 23 13935 \$27,036,248 11118 Federated Rural Electric Insurance Exchange 0 \$4,391,959 0.1% 0 28304 Federated Service Insurance Company 0 \$7,543,229 0.1% 0 2 43460 FFG Insurance Company \$8,409 0.0%9,999 39306 Fidelity & Deposit Company Maryland 1 \$10,942,218 0.1%14 Fidelity & Guaranty Insurance Company 35386 0 \$1,222,045 0.0%0 Fidelity & Guaranty Insurance Underwriters 0 0.0%0 25879 \$265,154 25180 Fidelity National Insurance Company 32 \$8,612,967 0.1%574 Fidelity National Prop. & Casualty Ins Co \$842,235 16578 1 0.0%183 Financial Guaranty Insurance Company 0 \$2,690,913 0.0%12815 0 Financial Indemnity Company 39 525 19852 \$11,466,543 0.1% 31453 Financial Pacific Insurance Company 0 \$15,184 0.0%0 18287 Financial Security Assurance Inc 0 \$2,919,655 0.0%0 Fire Insurance Exchange 40 0.4%189 21660 \$32,733,420 Firemans Fund Insurance Company \$24,612,313 21873 6 0.3%38 10336 First Acceptance Insurance Company Inc 38 \$5,420,113 0.1% 1,082 37710 First American Property & Casualty Ins Co 0.0%0 \$36,822 0 29980 First Colonial Insurance Company 2 \$5,360,222 0.1% 58 11177 First Financial Insurance Company 0 \$160 0.0%0 10676 First Guard Insurance Company 0 \$1,005,556 0.0%0 First Liberty Insurance Corp The 1 \$2,115,830 0.0%73 33588 2 42722 First Marine Insurance Company \$831,879 0.0%371 24724 First National Insurance Company Of America 0 \$4,652,630 0.1%0

Property and Casualty Insurance Complaint Indices (Excluding Accident and Health)
Alpha by Company

Alpha by Company					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
28519	First Sealord Surety Inc	0	\$105,685	0.0%	0
34916	First Specialty Insurance Corporation	0	\$19,529	0.0%	0
27626	Firstcomp Insurance Company	1	\$10,454,182	0.1%	15
13978	Florists Mutual Insurance Company	0	\$1,293,148	0.0%	0
11185	Foremost Insurance Company	30	\$14,710,760	0.0%	315
11800	Foremost Proeprty & Casualty Insurance Co	5	\$1,673,933	0.0%	461
41513	Foremost Signature Insurance Company	5	\$4,975,194	0.1%	155
10801	Fortress Insurance Company	0	\$174,269	0.0%	0
14249	Founders Insurance Company	0	\$243,702	0.0%	0
12361	Galen Insurance Company	0	\$2,505,093	0.0%	0
21253	Garrison Property & Casualty Insurance Co	0	\$1,154,517	0.0%	0
28339	Gateway Insurance Company	11	\$3,033,883	0.0%	560
41491	GEICO Casualty Company	8	\$3,065,689	0.0%	403
35882	GEICO Casualty Company GEICO General Ins Co	63		0.5%	214
22055		35	\$45,382,131 \$21,732,026	0.3%	249
24414	GEICO Indemnity Company Of Wissensin	9	\$21,732,926 \$15,933,578	0.3%	87
18821	General Casualty Company Of Wisconsin			0.2%	
	General Casualty Insurance Company	0	\$522,915 \$043,690	0.0%	0
30007	General Fidelity Insurance Company	0	\$943,689		0
24732	General Insurance Company Of America	0	\$7,459,414	0.1%	0
22039	General Reinsurance Corporation	0	\$1,014,637	0.0% 0.0%	0
11967	General Star National Ins Co Generali U S Branch	0	\$556,409 \$1,306,672	0.0%	0
11231		0	\$1,396,672	0.0%	0
38962	Genesis Insurance Company	0	\$630,818 \$106.701	0.0%	0
41432	Genworth Home Equity Insurance Corporation	0	\$106,791	0.0%	0
16675	Genworth Mortgage Insurance Corp Of NC	0	\$6 \$17.297.279		0
38458	Genworth Mortgage Insurance Corporation	0	\$16,286,378	0.2%	0
29823	Genworth Residential Mortgage Insurance Corp	0	\$435,702 \$221,467	0.0%	0
41343	Gerling America Insurance Company	0	\$221,467	0.0%	160
11044	GMAC Insurance Company Online Inc	1	\$914,485	0.0%	169
22063	Government Employees Insurance Co	26	\$19,155,972	0.2%	210
26310	Granite Re Inc	0	\$775,921	0.0%	0
23809	Granite State Insurance Company	1	\$5,260,235	0.1%	29
36307	Gray Insurance Company The	0	\$348,669	0.0%	0
26832	Great American Alliance Insurance Company	0	\$1,447,327	0.0%	0
26344	Great American Assurance Company	0	\$11,272,458	0.1%	0
16691	Great American Insurance Company	5	\$12,230,712	0.1%	63
22136	Great American Insurance Company Of NY	2	\$43,811,790	0.5%	7
33723	Great American Spirit Insurance Company	0	\$82,494	0.0%	0
25224	Great Divide Insurance Company	0	\$3,497,444	0.0%	0
20303	Great Northern Insurance Company	0	\$21,861,400	0.3%	0
11371	Great West Casualty Company	11	\$31,922,153	0.4%	53
22322	Greenwich Insurance Company	1	\$6,777,505	0.1%	23
14117	Grinnell Mutual Reinsurance Company	17	\$19,651,545	0.2%	134
16144	Grinnell Select Insurance Company	0	\$2,039,712	0.0%	0

Property and Casualty Insurance Complaint Indices (Excluding Accident and Health) Alpha by Company Code Name **Complaints Average Annual** Average Complaint 2006-2008 Premium 2006-Market Index 2008 Share 2006-2008 Guarantee Company Of North America USA 36650 0 \$213,546 0.0%0 11398 Guarantee Insurance Company 0 \$8,934,156 0.1% 0 2 92 42331 Guideone America Insurance Company \$3,359,993 0.0%Guideone Elite Insurance Company 1 0.1% 25 42803 \$6,103,488 15032 Guideone Mutual Insurance Company 23 \$8,650,545 0.1% 410 14559 Guideone Specialty Mutual Insurance Company 0 \$2,657,851 0.0%0 Hallmark Insurance Company 0.0%34037 3 \$870,468 532 Hanover Insurance Company The 22292 3 \$3,570,949 0.0%130 10829 Harbor Point Reinsurance US Inc 0 \$19,555 0.0%0 26433 Harco National Insurance Company 1 \$5,188,755 0.1% 30 23582 Harleysville Insurance Company 1 \$641,581 0.0%241 14168 Harleysville Mutual Insurance Co 0 \$160,078 0.0%0 71 22357 Hartford Accident & Indemnity Co 3 0.1%\$6,503,361 \$29,739,548 29424 Hartford Casualty Insurance Co 5 0.4%26 19682 Hartford Fire Insurance Company 10 \$43,440,900 0.5% 36 Hartford Insurance Company Of Midwest The 0.2%37478 14 \$14,569,762 148 11452 Hartford Steam Boiler Inspection & Ins 0 \$1,897,237 0.0%0 30104 Hartford Underwriters Insurance Company 37 \$53,575,152 0.6% 107 31550 Haulers Insurance Company Inc \$5,808,842 0.1%159 6 36919 Hawkeye Security Insurance Company 8 \$20,030,326 0.2%62 35904 Health Care Indemnity Inc 0 \$3,192,279 0.0%0 32077 Heritage Casualty Insurance Company 0 \$8,861 0.0%0 39527 Heritage Indemnity Company 0 0.0%0 \$171,865 10200 Hiscox Insurance Company Inc 0 \$158,668 0.0%0 14206 Holyoke Mutual Insurance Company In Salem 0 \$9,903 0.0%0 20419 Homesite Indemnity Company 39 \$5,369,860 0.1% 1,121 22578 Horace Mann Insurance Company 1 \$616,201 0.0%251 22756 Horace Mann Property & Casualty Ins Co 1 \$1,288,268 0.0%120 Housing Authority Property Insurance 0 10069 0 \$210,277 0.0%28657 HSBC Insurance Company Of Delaware 0 \$97,247 0.0%0 25054 Hudson Insurance Company 0 \$1,269,179 0 0.0%29068 IDS Property Casualty Insurance Company 1 0.0%45 \$3,450,785 Illinois National Insurance Company 23817 \$5,914,080 0.1% 26 1 43575 Indemnity Insurance Co Of North America 1 \$8,610,614 0.1% 18 29831 Independent Mutual Fire Insurance Company 0 \$82,387 0.0%0 Indiana Lumbermens Mutual Insurance Co 0 0.1% 0 14265 \$4,930,601 39497 Infinity Assurance Insurance Company 15 \$4,405,675 0.1% 526 11738 Infinity Auto Insurance Company 10 \$2,816,416 0.0%548 10061 Infinity Indemnity Insurance Company 0.0%1 \$606,577 254 22268 Infinity Insurance Company 1 \$221,186 0.0%698 12599 Infinity Standard Insurance Company 1 \$203,112 0.0%760 23264 Inland Insurance Company 0 \$85,561 0.0%0 0 22713 Insurance Company Of North America 0 \$26,948 0.0%19 92 19429 Insurance Company Of The State Of PA \$31,897,227 0.4%27847 Insurance Company Of The West 0 \$1,431,656 0.0%0

Property and Casualty Insurance Complaint Indices (Excluding Accident and Health)
Alpha by Company

Alpha by Company					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
10922	Insuremax Insurance Company	15	\$2,163,118	0.0%	1,070
22780	Integon General Insurance Corporation	0	\$97,253	0.0%	0
22772	Integon Indemnity Corporation	0	\$135,601	0.0%	0
29742	Integon National Insurance Company	1	\$202,277	0.0%	763
33367	Intermed Insurance Company	1	\$6,772,867	0.1%	23
11592	International Fidelity Insurance Company	0	\$1,110,965	0.0%	0
10749	Intrepid Insurance Company	0	\$801,354	0.0%	0
23647	Ironshore Indemnity Inc	0	\$22,742	0.0%	0
32921	Ismie Mutual Insurance Company	0	\$201,729	0.0%	0
11630	Jefferson Insurance Company	0	\$521,941	0.0%	0
14354	Jewelers Mutual Insurance Company	0	\$1,536,900	0.0%	0
15962	Kansas Bankers Surety Company The	0	\$3,492,064	0.0%	0
34703	Kansas Medical Mutual Insurance Company	0	\$2,402,765	0.0%	0
10914	Kansas Medicai Mutuai Insurance Company Kemper Independence Insurance Company	1	\$2,226,007	0.0%	69
13073	Keystone Mutual Insurance Company	0	\$44,328	0.0%	09
13073	,	0	\$6,250	0.0%	0
26077	Knightbrook Insurance Company			0.0%	ŭ
	Lancer Insurance Company	1	\$2,401,463	0.0%	64
37940	Lexington National Insurance Corporation	0	\$45,715	0.0%	0
13307	Lexon Insurance Company	0	\$455,575	0.0%	0 11
42404	Liberty Insurance Corporation	2 0	\$29,121,485	0.5%	
19917 23035	Liberty Insurance Underwriters Inc.	55	\$4,662,925	1.1%	0
23043	Liberty Mutual Fire Insurance Company	11	\$90,404,983 \$22,337,069	0.3%	94 76
33855	Liberty Mutual Insurance Company	2		0.5%	
	Lincoln General Insurance Company	10	\$5,808,723	0.1%	53
14400	Lititz Mutual Insurance Company		\$9,268,940		167
33600	LM Insurance Corporation	0	\$12,709,126	0.2%	0
22977	Lumbermens Mutual Casualty Company	0	\$13,854 \$730,739	0.0%	0
23108	Lumbermens Underwriting Alliance	0	\$739,728	0.0%	0
35769	Lyndon Property Insurance Company	2	\$24,512,271	0.3%	13
10051	Lyndon Southern Insurance Company	0	\$479,183	0.0%	0
36897	Manufacturers Alliance Insurance Company	0	\$228,490	0.0%	0
28932	Markel American Insurance Company	1	\$3,255,272	0.0%	47
38970	Markel Insurance Company	1	\$3,041,808	0.0%	51
19356	Maryland Casualty Company	2	\$6,453,953	0.1%	48
22306	Massachusetts Bay Insurance Company	3	\$837,828	0.0%	553
10784	Maxum Casualty Insurance Company	1	\$825,060	0.0%	187
12041	MBIA Insurance Corporation	0	\$4,217,906	0.1%	0
10686	Medical Liability Alliance	0	\$8,973,418	0.1%	0
11843	Medical Protective Company	1	\$15,419,285	0.2%	10
12754	Medicus Insurance Company	0	\$349,201	0.0%	0
22241	Medmarc Casualty Insurance Company	0	\$334,694	0.0%	0
11030	Memic Indemnity Company	0	\$425	0.0%	0
33650	Mendota Insurance Company	26	\$7,057,583	0.1%	569
31968	Merastar Insurance Company	1	\$297,057	0.0%	520

Property and Casualty Insurance Complaint Indices (Excluding Accident and Health) Alpha by Company Code Name **Complaints** Average Annual Average Complaint 2006-2008 Premium 2006-Market Index 2008 Share 2006-2008 14494 Merchants Bonding Company (mutual 0 \$1,036,875 0.0%0 10502 Meridian Citizens Mutual Insurance Company 0 \$15,212 0.0%0 0 23353 Meridian Security Insurance Company \$1,706,691 0.0%0 24821 Meritplan Insurance Company 3 \$314,974 0.0%1,470 40169 Metropolitan Casualty Insurance Company 0 \$346,878 0.0%0 25321 Metropolitan Direct Property & Casualty 1 \$1,656,812 0.0%93 \$225,931 Metropolitan General Insurance Company 39950 1 0.0%683 Metropolitan Group Property & Casualty Ins Co \$7,258,922 34339 17 0.1% 362 Metropolitan Property & Casualty Insurance Co 26298 16 \$9,674,153 0.1%255 27014 MFS Mutual Insurance Company 0 \$10,476 0.0%0 18740 MGIC Indemnity Corporation 0 \$1,117 0.0%0 38660 MIC General Insurance Corporation 1 \$920,857 0.0%168 0.0%MIC Property & Casualty Insurance Corporation 0 38601 \$60,433 0 14508 Michigan Millers Mutual Insurance Company 0 \$6,523,418 0.1%0 21687 Mid Century Insurance Company 105 \$80,682,390 1.0% 201 23418 Mid-continent Casualty Company \$2,472,458 0.0%1 62 Mid-continent Insurance Company 0 \$14,502 0.0%0 15380 23434 Middlesex Insurance Company 3 \$3,014,756 0.0%154 13126 Midwest Builders' Casualty Mutual Company 0 \$4,749,866 0.1%0 Midwest Employers Casualty Company 0 \$7,093,856 0 23612 0.1% 10895 Midwest Insurance Company 0 \$539,561 0.0%0 23515 Midwestern Indemnity Company The 27 \$44,160,331 0.5% 94 Millers Classified Insurance Company \$4,477,553 138 40185 4 0.1% 7 14583 Millers First Insurance Company \$4,986,868 0.1% 217 42234 Minnesota Lawyers Mutual Insurance Company 0 \$75,981 0.0%0 11964 Missouri Doctors Mutual Insurance Company 3 \$4,808,026 0.1% 96 10191 Missouri Employers Mutual Insurance Company 24 \$138,136,347 1.7% 27 27642 Missouri Hospital Plan 0 \$31,025,617 0.4% 0 Missouri Professionals Mutual 0.5%11582 3 \$41,308,384 11 00103 Missouri Property Insurance Placement Facility 13 \$2,877,085 0.0%698 Mitsui Sumitomo Ins Co Of America \$1,815,500 0 20362 0 0.0%22551 Mitsui Sumitomo Insurance USA Inc 0 \$441,229 0.0%0 0 23655 Modern Service Insurance Company 0 \$3,768 0.0%32506 Monroe Guaranty Insurance Company 0 \$38,970 0.0%0 Mortgage Guaranty Insurance Corporation 0 29858 0 \$28,166,999 0.3% Motors Insurance Corporation 0 \$4,846,544 0.1% 0 22012 Mutualaid Exchange 0 11878 0 \$436,688 0.0%23663 National American Insurance Company 0 \$1,364,052 0.0%0 0.1% 160 11991 National Casualty Company 8 \$7,715,613 10243 National Continental Insurance Company 0 \$17,171 0.0%0 16217 National Farmers Union Property & Casualty Co 0 \$747,737 0.0%0 15679 National Fire & Indemnity Exchange 1 \$236,490 0.0%653 20478 National Fire Insurance Company Of Hartford 2 \$10,228,775 0.1%30 2 42447 National General Assurance Company \$1,291,826 0.0%239 5 23728 National General Insurance Company \$6,144,247 0.1%126

Property and Casualty Insurance Complaint Indices (Excluding Accident and Health)
Alpha by Company

Alpha by Company					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006-	Complaint Index
20005	N : 17 1 : 0		#5.5.10.500	2008	
20087	National Indemnity Company	2	\$5,540,522	0.1%	56
27944	National Insurance Association	2	\$543,779	0.0%	568
32620	National Interstate Insurance Company	2	\$5,902,213	0.1%	52
20052	National Liability & Fire Insurance Company	2	\$4,186,381	0.1%	74
15474	National Lloyds Insurance Company	7	\$1,569,434	0.0%	689
22608	National Specialty Insurance Company	1	\$1,272,197	0.0%	121
21881	National Surety Corporation	3	\$6,402,075	0.1%	72
20141	National Trust Insurance Company	0	\$90,106	0.0%	0
19445	National Union Fire Ins Co of Pittsburgh	7	\$71,559,614	0.9%	15
26093	Nationwide Affinity Insurance Co Of America	15	\$21,723,553	0.3%	107
28223	Nationwide Agribusiness Insurance Company	2	\$7,680,029	0.1%	40
25453	Nationwide Insurance Company Of America	6	\$9,081,658	0.1%	102
23779	Nationwide Mutual Fire Insurance Company	1	\$142,646	0.0%	1,082
23787	Nationwide Mutual Insurance Company	15	\$39,115,296	0.5%	59
25240	NAU Country Insurance Company	0	\$15,323,332	0.2%	0
42307	Navigators Insurance Company	2	\$4,153,641	0.0%	74
15865	NCMIC Insurance Company	0	\$1,373,915	0.0%	0
10317	Neighborhood Spirit Property & Casualty Co	1	\$103,139	0.0%	1,497
24171	Netherlands Insurance Company The	0	\$16,645,118	0.2%	0
23841	New Hampshire Insurance Company	11	\$39,926,213	0.5%	43
12130	New South Insurance Company	3	\$2,523,475	0.0%	184
16608	New York Marine & General Insurance Co	0	\$1,391,371	0.0%	0
14788	NGM Insurance Company	0	\$1,403	0.0%	0
27073	Nipponkoa Insurance Company LTD	0	\$3,482	0.0%	0
29700	North American Elite Insurance Company	0	\$40, 007	0.0%	0
29874	North American Specialty Insurance Company	0	\$2,087,234	0.0%	0
27740	North Pointe Insurance Company	0	\$493,580	0.0%	0
21105	North River Insurance Company The	0	\$2,866,193	0.0%	0
36455	Northbrook Indemnity Company	2	\$29,683	0.0%	9,999
38369	Northern Assurance Company Of America	0	\$3,153,677	0.0%	0
19372	Northern Insurance Company Of New York	0	\$1,141,129	0.0%	0
27987	Northfield Insurance Company	1	\$1,245,097	0.0%	124
24015	Northland Insurance Company	5	\$9,307,480	0.1%	83
42552	Nova Casualty Company	0	\$119,313	0.0%	0
34630	Oak River Insurance Company	2	\$6,999,697	0.1%	44
23248	Occidental Fire & Casualty Company of NC	0	\$2,626,852	0.0%	0
24074	Ohio Casualty Insurance Company	7	\$9,614,053	0.1%	112
24104	Ohio Farmers Insurance Company	0	\$28,105	0.0%	0
26565	Ohio Indemnity Company	0	\$1,073,919	0.0%	0
24082	Ohio Security Insurance Company	0	\$319,094	0.0%	0
36625	Old Reliable Casualty Company	23	\$4,160,164	0.0%	853
24139	Old Republic General Insurance Corporation	0	\$470,638	0.0%	0
24147	Old Republic Insurance Company	4	\$40,652,629	0.5%	15
40444	Old Republic Surety Company	0	\$944,541	0.0%	0

Property and Casualty Insurance Complaint Indices (Excluding Accident and Health) Alpha by Company Code Name **Complaints** Average Annual Average Complaint 2006-2008 Premium 2006-Market Index 2008 Share 2006-2008 37060 Old United Casualty Company 1 \$1,089,818 0.0%142 34940 Omni Indemnity Company 2 \$476,886 0.0%647 3 39098 Omni Insurance Company \$618,122 0.0%749 Onebeacon America Insurance Company 0 \$4,511,385 0.1% 0 20621 21970 Onebeacon Insurance Company 2. \$4,222,777 0.1% 73 \$40,303,603 32700 Owners Insurance Company 13 0.5% 50 Pacific Employers Insurance Company 0.0%0 22748 0 \$1,342,425 Pacific Indemnity Company \$6,563,806 24 20346 1 0.1% Pacific Specialty Insurance Company 0 0 37850 \$34,567 0.0%0 10222 PACO Assurance Company Inc 0 \$51,230 0.0%18333 Peerless Indemnity Insurance Company 2 \$2,686,128 0.0%115 3 24198 Peerless Insurance Company \$10,894,048 0.1% 43 0.0%0 0 32859 Penn America Insurance Company \$5,582 Penn Millers Insurance Company 14982 0 \$730,057 0.0%0 \$402,728 21962 Pennsylvania General Insurance Company 0 0.0%0 14974 2 \$3,840,266 80 Pennsylvania Lumbermens Mutual Insurance Co 0.0%12262 Pennsylvania Manufacturers Association Ins Co 0 \$1,182,019 0.0%0 41424 Pennsylvania Manufacturers Indemnity Company 0 \$322,873 0.0%0 14990 Pennsylvania National Mutual Casualty Ins Co 0 \$177,445 0.0%0 0 0 37648 Permanent General Assurance Corporation \$68,437 0.0%12297 Petroleum Casualty Company 0 0.0%0 \$131 13714 Pharmacists Mutual Insurance Company 3 \$6,268,094 0.1% 74 Philadelphia Indemnity Insurance Company 3 0.4%13 18058 \$34,644,177 25623 Phoenix Insurance Company The 2 \$10,240,690 0.1% 30 13194 Physicians Insurance Mutual 0 \$386,076 0.0%0 2 34 11704 Physicians Professional Indemnity Association \$9,178,168 0.1% 0 0 12670 Pioneer General Insurance Company \$6,296 0.0%235 18619 Platte River Insurance Company 1 \$656,089 0.0%0 \$122,316 30945 Plaza Insurance Company 0.0%0 27251 PMI Mortgage Insurance Company 0 \$15,857,518 0.2%0 Podiatry Ins Co of America 0 \$1,565,684 0 14460 0.0%37257 Praetorian Insurance Company \$4,473,226 35 1 0.1%0 44083 Preferred Physicians Medical RRG Inc 0 \$2,952,825 0.0%36234 Preferred Professional Insurance Company 0 \$2,914,641 0.0%0 0 10800 Premier Group Insurance Company 0 \$1,054,145 0.0%0 0.2%0 33391 Proassurance Indemnity Company Inc \$19,411,627 21903 Procentury Insurance Company 0 0 \$43,240 0.0%34312 Producers Agriculture Insurance Company 0 \$5,386,523 0.1% 0 12513 Professional Liability Ins Co Of America 0 \$3,721,800 0.0%0 11127 Professional Solutions Insurance Company 0 \$1,049,739 0.0%0 25585 Professionals Direct Insurance Company 0 \$1,063,662 0.0%0 24260 Progressive Casualty Insurance Company 25 \$10,455,488 0.1%369 42994 Progressive Classic Insurance Company 15 0.1%244 \$9,509,264 16322 Progressive Direct Insurance Company 34 \$35,935,934 0.4%146 24279 Progressive Max Insurance Company 34 \$32,032,688 0.4%164

Property and Casualty Insurance Complaint Indices (Excluding Accident and Health)
Alpha by Company

Alpha by Company					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
42919	Progressive Northwestern Insurance Company	50	\$33,007,774	0.4%	234
37834	Progressive Preferred Insurance Company	75	\$66,243,394	0.4%	175
32786	Progressive Specialty Insurance Company	3	\$2,380,572	0.0%	195
34690	Property & Casualty Insurance Co of Hartford	33	\$23,189,133	0.3%	220
12416	Protective Insurance Company	1	\$2,474,641	0.0%	62
28711	Providence Property & Casualty Ins Co	0	\$197,746	0.0%	0
39217	QBE Insurance Corporation	0	\$935,725	0.0%	0
23752	Quanta Indemnity Company	0	\$263,120	0.0%	0
36250	Radian Asset Assurance Inc	0	\$648,025	0.0%	0
33790	Radian Guaranty Inc	0	\$15,644,963	0.2%	0
11853	Ranchers & Farmers Insurance Company	0	\$407	0.276	0
37303	Redland Insurance Company	0	\$883,919	0.0%	0
24449	Regent Insurance Company	0	\$4,889,785	0.0%	0
22179	Republic Indemnity Company Of America	0	\$99,590	0.176	0
43753	1 , 1 ,	0		0.0%	0
28452	Republic Indemnity Company Of California	0	\$6,236 \$12,130,991	0.0%	0
31089	Republic Mortgage Insurance Company	2		0.1%	ů.
	Republic Western Insurance Company		\$306,264 \$448.207	0.0%	1,008 0
43044	Response Insurance Company	0	\$448,207 \$005,337	0.0%	_
26050	Response Worldwide Insurance Company	1	\$995,337		155
36684	Riverport Insurance Company	0	\$1,023,089	0.0% 0.0%	0
28860	RLI Indemnity Company	$0 \\ 0$	\$9,262	0.0%	0
13056	RLI Insurance Company		\$5,460,897	0.1%	0
42706	Roche Surety & Casualty Company Inc	0	\$60,695	0.0%	0
27065 22314	Rockford Mutual Insurance Company	0	\$488,976 \$0.365.457	0.0%	0
	RSUI Indemnity Company	0	\$9,365,457		0 7
39039	Rural Community Insurance Company	1	\$23,429,432	0.3%	
25405	Safe Auto Insurance Company	14	\$2,707,415	0.0%	798 153
24740	Safeco Insurance Company Of America	52	\$52,736,268	0.6%	152
39012	Safeco Insurance Company Of Illinois	156	\$123,074,110	1.5%	196
24759	Safeco National Insurance Company	0	\$5,338	0.0%	0
11123	Safety First Insurance Company	0	\$16,678	0.0%	0
15105	Safety National Casualty Corporation	0	\$13,489,348	0.2%	0
40460	Sagamore Insurance Company	12	\$3,310,893	0.0%	560
16551	Savers Property & Casualty Insurance Company	3	\$21,285,702	0.3%	22
15580	Scottsdale Indemnity Company	1	\$303,648	0.0%	508
15563	Sea Bright Insurance Company	0	\$1,443,734	0.0%	0
22543	Secura Insurance A Mutual Company	6	\$23,464,469	0.3%	39
10239	Secura Supreme Insurance Company	3	\$4,945,758	0.1%	94
10054	Securian Casualty Company	0	\$1,676	0.0%	0
19879	Security National Insurance Company	0	\$717,875	0.0%	0
12572	Selective Insurance Company Of America	0	\$10,464	0.0%	0
19259	Selective Insurance Company Of South Carolina	2	\$3,933,771	0.0%	78
39926	Selective Insurance Company Of The Southeast	0	\$1,923,569	0.0%	0
10936	Seneca Insurance Company Inc	0	\$669,239	0.0%	0

Property and Casualty Insurance Complaint Indices (Excluding Accident and Health) Alpha by Company Code Name **Complaints Average Annual** Average Complaint 2006-2008 Premium 2006-Market Index 2008 Share 2006-2008 11000 Sentinel Insurance Company Ltd 10 \$5,081,359 0.1%304 28460 Sentry Casualty Company 0 \$517,200 0.0%0 12 24988 Sentry Insurance A Mutual Company \$14,120,846 0.2%131 \$19,006,881 Sentry Select Insurance Company 3 0.2%21180 24 36560 Service Insurance Company 0 \$8,872 0.0%0 11347 SFM Mutual Insurance Company 0 \$5,295 0.0%0 Shelter General Insurance Company 12 \$10,071,899 0.1% 23361 184 Shelter Mutual Insurance Company 208 \$275,293,006 23388 3.3% 117 Shelter Reinsurance Company 26557 0 \$5,000 0.0%0 0 11126 Sompo Japan Insurance Company Of America 0 \$1,465,624 0.0%Southern Insurance Company 29 19216 1 \$5,325,028 0.1%16047 Southern Pioneer Property & Casualty Ins Co 2 \$692,315 0.0%446 Sparta Insurance Company 0 0.0%20613 \$61,878 0 24767 St Paul Fire & Marine Insurance Company 3 \$23,596,022 0.3% 20 24775 St Paul Guardian Insurance Company 0 \$686,234 0.0%0 24791 2 \$10,409,709 30 St Paul Mercury Insurance Company 0.1% 19224 St Paul Protective Insurance Company 0 \$1,127,570 0.0%0 19070 Standard Fire Insurance Company 45 \$35,513,888 0.4% 196 42986 Standard Guaranty Insurance Company 0 \$227,142 0.0%0 18023 Star Insurance Company \$2,470,003 0.0%62 1 Starnet Insurance Company \$2,411,675 40045 0 0.0%0 19530 State Auto National Insurance Company 2 \$505,675 0.0%611 State Auto Property & Casualty Insurance Co \$24,410,476 0.3% 25127 11 70 25135 State Automobile Mutual Insurance Company 1 \$1,484,975 0.0%104 25143 State Farm Fire & Casualty Company 301 \$468,862,444 5.6% 99 79 25178 State Farm Mutual Automobile Insurance Co 303 \$595,038,294 7.1% 12831 State National Insurance Company Inc 1 \$7,442,429 0.1%21 2 10952 Stonebridge Casualty Insurance Company \$1,674,383 0.0%184 Stonington Insurance Company 3 0.1%10340 \$4,648,051 100 40436 Stratford Insurance Company 2 \$1,199,312 0.0%257 SUA Insurance Company 1 \$619,438 0.0%249 40134 10909 Sun Surety Insurance Company 0 \$21,367 0.0%0 Surety Bonding Company Of America 0 24047 0 \$34,359 0.0%20311 Syncora Guarantee Inc-Suspended-0 \$1,246,320 0.0%0 0 12866 THE Insurance Company 0 \$1,489,966 0.0%Teachers Insurance Company 0 \$2,044,427 0.0%0 22683 42376 Technology Insurance Company \$3,986,099 155 4 0.0%25534 TIG Insurance Company 0 \$2,770 0.0%0 12904 Tokio Marine & Nichido Fire Insurance Co Ltd 0 \$3,198,949 0.0%0 44300 Tower Insurance Company Of New York 0 \$30,841 0.0%0 37621 Toyota Motor Insurance Company 0 \$428,736 0.0%0 42749 Traders Insurance Company 33 \$4,018,184 0.0%1,268 41238 Trans Pacific Insurance Company 0 \$16,319 0.0%0 2 28886 Transguard Ins Co of America Inc \$1,059,828 0.0%291 33014 Transport Insurance Company-Suspended-1

Property and Casualty Insurance Complaint Indices (Excluding Accident and Health)

Alpha by Company

	Alpha by	Company			
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
20494	Transportation Insurance Company	2	\$6,218,657	0.1%	50
28188	Travco Insurance Company	0	\$1,372,027	0.0%	0
31194	Travelers Casualty & Surety Co Of America	2	\$27,065,433	0.3%	11
19038	Travelers Casualty & Surety Company	3	\$5,533,462	0.1%	84
19046	Travelers Casualty Ins Co of America	0	\$2,954,353	0.0%	0
40282	Travelers Commercial Casualty Company	31	\$26,795,833	0.3%	179
36137	Travelers Commercial Insurance Company	3	\$1,630,927	0.0%	284
27998	Travelers Home & Marine Insurance Company	30	\$36,645,415	0.4%	126
25658	Travelers Indemnity Company	6	\$31,203,257	0.4%	30
25666	Travelers Indemnity Company Of America	3	\$24,944,572	0.3%	19
25682	Travelers Indemnity Company Of Connecticut	3	\$11,350,457	0.1%	41
38130	Travelers Personal Insurance Company	8	\$5,014,502	0.1%	246
25674	Travelers Prop Casualty Co of America	12	\$68,199,618	0.8%	27
36161	Travelers Property Casualty Insurance Company	0	\$1,243,609	0.0%	0
31003	Tri State Insurance Company Of Minnesota	0	\$233	0.0%	0
24350	Triad Guaranty Insurance Corporation	0	\$890,654	0.0%	0
19887	Trinity Universal Insurance Company	1	\$437,136	0.0%	353
15954	Trinity Universal Insurance Company Of Kansas	0	\$158,054	0.0%	0
41211	•	3	\$894,280	0.0%	518
41106	Triton Insurance Company Triumpho Converty Company	0	· · · · · · · · · · · · · · · · · · ·	0.0%	0
21709	Triumphe Casualty Company Truck Legyronge Evelonge		\$4,398 \$10,855,243	0.0%	14
27120	Truck Insurance Exchange	1 3		0.1%	516
	Trumbull Insurance Company	19	\$896,912	0.0%	
29459	Twin City Fire Insurance Company		\$29,998,655		98
29599	U S Specialty Insurance Company	0	\$5,156,072	0.1%	0
37893	Ullico Casualty Company	0	\$149,914	0.0%	0
25844	Union Insurance Company	0	\$1,451,785	0.0%	0
21423	Union Insurance Company Of Providence	2	\$679,290	0.0%	455
11770	United Financial Casualty Company	13	\$12,794,905	0.2%	157
13021	United Fire & Casualty Company	14	\$33,449,810	0.4%	65
26999	United Guaranty Mortgage Indemnity Company	0	\$354,590	0.0%	0
15873	United Guaranty Residential Insurance Company	0	\$16,754,188	0.2%	0
16667	United guaranty Residential Insurance Of NC	0	\$232,887	0.0%	0
21776	United Security Insurance Company	0	\$17,057	0.0%	0
25941	United Services Automobile Association	36	\$57,526,216	0.7%	97
25887	United States Fidelity & Guaranty Company	0	\$3,187,219	0.0%	0
21113	United States Fire Insurance Company	2	\$7,859,039	0.1%	39
25895	United States Liability Insurance Company	1	\$2,631,320	0.0%	59
29157	United Wisconsin Insurance Company	0	\$2,029,497	0.0%	0
10915	Unitrin Direct Property & Casualty Company	14	\$2,945,517	0.0%	734
25909	Unitrin Preferred Insurance Company	3	\$2,181,424	0.0%	212
42862	Universal Casualty Company	18	\$2,052,418	0.0%	1,354
32867	Universal Fire & Casualty Insurance Company	0	\$2,960	0.0%	0
25933	Universal Surety Company	0	\$379,988	0.0%	0
13200	Universal Surety Of America	0	\$140,370	0.0%	0

Property and Casualty Insurance Complaint Indices (Excluding Accident and Health) Alpha by Company Complaints Code Name Average Annual Average Complaint 2006-2008 Premium 2006-Market Index 2008 Share 2006-2008 Universal Underwriters Ins Co 41181 3 \$23,678,647 0.3% 20 40843 Universal Underwriters Of TX Insurance Co 0 \$412,862 0.0%0 0 0 29998 Upper Hudson National Insurance Company \$567 0.0%25968 USAA Casualty Insurance Company 11 \$31,540,936 0.4%54 18600 USAA General Indemnity Company 2 \$2,618,483 0.0%118 25976 Utica Mutual Insurance Company 1 \$2,228,802 0.0%69 Valiant Insurance Company 0 \$59,798 0.0%0 26611 Valley Forge Insurance Company \$7,218,347 21 20508 1 0.1% Vanliner Insurance Company 2 \$24,919,807 21172 0.3%12 18759 Verex Assurance Incorporated 0 \$2,389 0.0%0 Verlan Fire Insurance Company 0 10815 0 \$435,213 0.0%10644 Victoria Automobile Insurance Company 8 \$3,916,346 0.0%315 42889 Victoria Fire & Casualty Company 0.0%1,394 1 \$110,749 20397 Vigilant Insurance Company 2 \$8,347,004 0.1%37 13137 Viking Insurance Company Of Wisconsin 20 \$6,558,250 0.1% 471 Virginia Surety Company Inc 2 40827 \$2,214,280 0.0%139 32778 Washington International Insurance Company 0 0.0%0 \$511,063 26069 Wausau Business Insurance Company 2 \$7,470,684 0.1% 41 Wausau Underwriters Insurance Company 26042 0 \$12,483,919 0.1% 0 25011 Wesco Insurance Company 3 191 \$2,426,162 0.0%44393 West American Insurance Company 2 \$7,052,242 0.1%44 21121 Westchester Fire Insurance Company 0 \$10,608,818 0.1%0 Western Agricultural Insurance Company 4 \$2,012,911 0.0%307 27871 27502 Western General Insurance Company Inc 0 \$11,182 0.0%0 13188 Western Surety Company 2 \$8,964,431 0.1% 34 0 24112 Westfield Insurance Company \$4,528,375 0.1% 0 2 17 39845 Westport Insurance Corporation \$18,473,659 0.2%0 31232 Work First Casualty Company \$326,290 0.0%0 Workmens Auto Insurance Company 8 0.0%944 13250 \$1,308,807 24554 XL Insurance America Inc 0 \$4,893,700 0.1% 0 37885 XL Specialty Insurance Company \$13,583,163 0.2%11 1 26220 Yosemite Insurance Company 0 \$272,126 0.0%0 27090 Young America Insurance Company 185 4 \$3,334,211 0.0%30325 Zale Indemnity Company 0 \$9,443 0.0%0 0 0 13269 Zenith Insurance Company \$7,140,811 0.1% 16535 Zurich American Insurance Company 8 \$79,671,073 1.0% 16 Zurich American Insurance Company Of Illinois 0 \$3,162,252 0.0%27855 0 Total 5,413 \$8,356,360,928 100.0%

Private Passenger Automobile Insurance

Complaint Indices

	Private Passenger Automobile Alpha by		inpraint muices		
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
44725	1st Auto & Casualty Insurance Company	0	\$22,300	0.0%	0
12963	21st Century Insurance Company	0	\$882,812	0.0%	0
22667	Ace American Insurance Company	1	\$-106	- 0.0%	9,999
14184	Acuity A Mutual Insurance Company	0	\$2,893,966	0.1%	0
33898	Aegis Security Insurance Company	0	\$3,594	0.0%	0
42609	Affirmative Insurance Company	117	\$12,513,083	0.5%	863
25232	AIG Advantage Insurance Company	0	\$181,872	0.0%	0
19402	AIG Casualty Company	0	\$842,572	0.0%	0
34789	AIG Centennial Insurance Company	4	\$1,793,835	0.1%	206
36587	AIG National Insurance Company Inc	27	\$7,040,269	0.3%	354
20796	AIG Premier Insurance Company	0	\$1,417,688	0.1%	0
19399	AIU Insurance Company	3	\$2,232,381	0.1%	124
12188	Alfa Vision Insurance Corporation	26	\$5,055,400	0.2%	475
42579	Allied Property & Casualty Insurance Company	16	\$27,347,665	1.0%	54
41840	Allmerica Financial Benefit Insurance Company	0	\$554	0.0%	0
29688	Allstate Fire & Casualty Insurance Company	24	\$25,842,859	0.9%	86
19240	Allstate Indemnity Company	15	\$8,191,457	0.3%	169
19232	Allstate Insurance Company	66	\$46,926,155	1.7%	130
17230	Allstate Property & Casualty Insurance Company	71	\$56,155,762	2.0%	117
38156	Alpha Property & Casualty Insurance Co	7	\$1,479,459	0.1%	437
19100	AMCO Insurance Company	9	\$9,937,443	0.4%	84
10111	American Bankers Insurance Company Of FL	1	\$1,984,895	0.1%	46
20427	American Casualty Company Of Reading PA	0	\$2	0.0%	0
23450	American Family Home Insurance Company	0	\$2,076,709	0.1%	0
19275	American Family Mutual Insurance Company	303	\$433,329,229	15.7%	65
24066	American Fire & Casualty Company	0	\$261,703	0.0%	0
43494	American Hallmark Insurance Company Of TX	0	\$63,785	0.0%	0
19380	American Home Assurance Company	10	\$4,153,891	0.2%	222
32220	American International Insurance Company	0	\$1,313,202	0.0%	0
40258	American International South Insurance Co	26	\$6,605,021	0.2%	363
23469	American Modern Home Insurance Co	0	\$1,670,887	0.1%	0
38652	American Modern Select Insurance Company	0	\$175,952	0.0%	0
39942	American National General Insurance Company	1	\$862,436	0.0%	107
28401	American National Property & Casualty Co	14	\$17,234,764	0.6%	75
19615	American Reliable Insurance Company	0	\$92,030	0.0%	0
	_ :				

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\$1,952,235

\$202,381

\$269,713

\$12,594,204

\$6,186,447

\$72,085,297

42978

42897

19283

23396

27928

19976

41459

19895

27235

18988

American Security Insurance Company

American Service Insurance Company

American Standard Insurance Co of WI

Amerisure Mutual Insurance Company

AMICA Mutual Insurance Company

Auto Club Family Insurance Company

Atlantic Mutual Insurance Company-Suspended-

Armed Forces Insurance Exchange

Auto Owners Insurance Company

Amex Assurance Company

0.0%

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1,183

111

145

912

342

220

30

Private Passenger Automobile Insurance Complaint Indices					
Alpha by Company					

Alpha by Company					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
15512	Automobile Club Inter-insurance Exchange	97	\$89,851,869	3.2%	100
19062	Automobile Ins Co Of Hartford CT	1	\$615,843	0.0%	150
24813	Balboa Insurance Company	1	\$428,846	0.0%	215
18279	Bankers Standard Insurance Company	0	\$62,451	0.0%	0
19658	Bristol West Insurance Company	6	\$3,038,288	0.1%	182
35955	California Casualty General Ins Co of Oregon	0	\$1,700,146	0.1%	0
20117	California Casualty Indemnity Exchange	4	\$1,178,148	0.0%	313
15725	Cameron Mutual Insurance Company	19	\$18,273,739	0.7%	96
42498	Cameron National Insurance Company	0	\$5,349,667	0.2%	0
19909	Centennial Insurance Company-Suspended-	0	\$105,813	0.0%	0
37524	Charter Indemnity Company	1	\$686,521	0.0%	134
10052	Chubb National Insurance Company	0	\$360,827	0.0%	0
10677	Cincinnati Insurance Company The	5	\$2,771,404	0.1%	167
31534	Citizens Insurance Company Of America	0	\$17,823	0.0%	0
40371	Columbia Mutual Insurance Company	15	\$12,068,718	0.4%	115
10204	Consumers Insurance USA Inc	20	\$4,282,475	0.4%	431
35289	Continental Insurance Company The	20	\$-605	- 0.0%	9,999
10783	Cornerstone National Insurance Company	20	\$16,308,310	0.6%	113
20982	Country Casualty Insurance Company	0	\$586,416	0.0%	0
20982	Country Casualty Insurance Company Country Mutual Insurance Company	9	\$5,463,619	0.0%	152
21008	Country Preferred Insurance Company	7		0.276	92
		19	\$7,044,123	0.5%	
21164 37907	Dairyland Insurance Company		\$14,435,144	0.5%	121
	Deerbrook Insurance Company	2	\$364,700		506
42587	Depositors Insurance Company	9	\$8,694,348	0.3%	96 527
42781	Direct General Insurance Company	24	\$4,199,284	0.2%	527
23736	Direct National Insurance Company	6	\$1,674,445	0.1%	331
22926	Economy Fire & Casualty Company	0	\$58 \$2.412.208	0.0%	0
40649	Economy Premier Assurance Company	5	\$2,413,308	0.1%	191
21261	Electric Insurance Company	0	\$2,431,310	0.1%	0
21407	Emcasco Insurance Company	0	\$187,803	0.0%	0
21415	Employers Mutual Casualty Company	2	\$41,492	0.0%	4,449
15130	Encompass Indemnity Company	3	\$4,376,831	0.2%	63
10071	Encompass Insurance Company Of America	1	\$1,781,258	0.1%	52
37915	Essentia Insurance Company	0	\$494,244	0.0%	0
25712	Esurance Insurance Company	36	\$15,695,459	0.6%	212
26859	Farm Bureau Town & Country Ins Co Of MO	61	\$55,292,699	2.0%	102
19194	Farmers Alliance Mutual Insurance Company	2	\$879,275	0.0%	210
21628	Farmers Insurance Company Inc	136	\$133,377,451	4.8%	94
16381	Farmers Union Cooperative Insurance Company	2	\$339,741	0.0%	543
20281	Federal Insurance Company	0	\$992,298	0.0%	0
39306	Fidelity & Deposit Company Maryland	0	\$2	0.0%	0
25180	Fidelity National Insurance Company	2	\$1,786,352	0.1%	103
19852	Financial Indemnity Company	39	\$11,466,543	0.4%	314
21873	Firemans Fund Insurance Company	3	\$4,787,857	0.2%	58
10336	First Acceptance Insurance Company Inc	38	\$5,353,532	0.2%	655

Private Passenger Automobile Insurance Complaint Indices				
Alpha by Company				
Complaints Average Annual	A			

Alpha by Company					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006-	Complaint Index
				2008	
33588	First Liberty Insurance Corp The	1	\$1,208,954	0.0%	76
11185	Foremost Insurance Company	5	\$3,591,582	0.1%	128
41513	Foremost Signature Insurance Company	0	\$90,710	0.0%	0
21253	Garrison Property & Casualty Insurance Co	0	\$810,986	0.0%	0
28339	Gateway Insurance Company	8	\$1,312,837	0.0%	562
41491	GEICO Casualty Company	7	\$3,065,689	0.1%	211
35882	GEICO General Ins Co	63	\$45,382,117	1.6%	128
22055	GEICO Indemnity Company	35	\$21,731,436	0.8%	149
24414	General Casualty Company Of Wisconsin	1	\$-334	- 0.0%	9,999
11044	GMAC Insurance Company Online Inc	1	\$914,485	0.0%	101
22063	Government Employees Insurance Co	26	\$18,963,091	0.7%	127
26832	Great American Alliance Insurance Company	0	\$384	0.0%	0
26344	Great American Assurance Company	0	\$18,736	0.0%	0
16691	Great American Insurance Company	1	\$15,532	0.0%	5,942
22136	Great American Insurance Company Of NY	0	\$440	0.0%	0
20303	Great Northern Insurance Company	0	\$1,420,887	0.1%	0
14117	Grinnell Mutual Reinsurance Company	9	\$3,974,944	0.1%	209
16144	Grinnell Select Insurance Company	0	\$2,039,712	0.1%	0
42331	Guideone America Insurance Company	1	\$2,519,634	0.1%	37
42803	Guideone Elite Insurance Company	1	\$1,798,231	0.1%	51
15032	Guideone Mutual Insurance Company	4	\$876,308	0.0%	421
14559	Guideone Specialty Mutual Insurance Company	0	\$23,268	0.0%	0
34037	Hallmark Insurance Company	3	\$476,174	0.0%	581
22292	Hanover Insurance Company The	1	\$14,046	0.0%	6,571
22357	Hartford Accident & Indemnity Co	2	\$406,956	0.0%	454
29424	Hartford Casualty Insurance Co	0	\$49,621	0.0%	0
19682	Hartford Fire Insurance Company	4	\$980,806	0.0%	376
37478	Hartford I he histrance Company Of Midwest The	9	\$7,717,231	0.3%	108
30104	Hartford Underwriters Insurance Company	23	\$16,032,246	0.6%	132
31550	Haulers Insurance Company Inc	5	\$4,081,798	0.1%	113
22578	Horace Mann Insurance Company		\$141,777	0.176	0
22756	Horace Mann Property & Casualty Ins Co	0 1	\$1,288,268	0.0%	72
29068	IDS Property Casualty Insurance Company		\$2,302,998	0.0%	40
		1 1	\$256,519	0.176	
23817	Illinois National Insurance Company		· · · · · · · · · · · · · · · · · · ·		360
39497	Infinity Assurance Insurance Company	15	\$4,405,675	0.2%	314
11738	Infinity Auto Insurance Company	9	\$2,696,958	0.1%	308
10061	Infinity Indemnity Insurance Company	1	\$606,577	0.0%	152
22268	Infinity Insurance Company	1	\$221,186	0.0%	417
12599	Infinity Standard Insurance Company	0	\$145	0.0%	0
19429	Insurance Company Of The State Of PA	17	\$7,717,975	0.3%	203
10922	Insuremax Insurance Company	15	\$2,163,118	0.1%	640
22780	Integon General Insurance Corporation	0	\$97,253	0.0%	0
22772	Integon Indemnity Corporation	0	\$135,601	0.0%	0
29742	Integon National Insurance Company	1	\$130,119	0.0%	709
10914	Kemper Independence Insurance Company	0	\$1,224,700	0.0%	0

Private Passenger Automobile Insurance Complaint Indices
Alpha by Company
Complaints Average Annual

	Alpha by Company				
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
42404	Liberty Insurance Corporation	1	\$417,086	0.0%	221
23035	Liberty Mutual Fire Insurance Company	24	\$27,786,037	1.0%	80
23043	Liberty Mutual Insurance Company Liberty Mutual Insurance Company	3	\$1,298	0.0%	9,999
35769	Lyndon Property Insurance Company	0	\$4,929	0.0%	0,999
10051		0	· · · · · ·	0.0%	0
	Lyndon Southern Insurance Company	_	\$208,240 \$375,447		
28932	Markel American Insurance Company	0	\$375,447	0.0%	0
22306	Massachusetts Bay Insurance Company	0	\$15,727	0.0%	0
33650	Mendota Insurance Company	26	\$7,057,508	0.3%	340
31968	Merastar Insurance Company	1	\$247,823	0.0%	372
23353	Meridian Security Insurance Company	0	\$1,649,241	0.1%	0
24821	Meritplan Insurance Company	3	\$62,215	0.0%	4,450
40169	Metropolitan Casualty Insurance Company	0	\$346,878	0.0%	0
25321	Metropolitan Direct Property & Casualty	1	\$1,656,812	0.1%	56
39950	Metropolitan General Insurance Company	1	\$225,931	0.0%	408
34339	Metropolitan Group Property & Casualty Ins Co	14	\$5,352,751	0.2%	241
26298	Metropolitan Property & Casualty Insurance Co	3	\$4,388,987	0.2%	63
38660	MIC General Insurance Corporation	1	\$920,857	0.0%	100
21687	Mid Century Insurance Company	43	\$31,831,056	1.1%	125
23434	Middlesex Insurance Company	1	\$1,701,837	0.1%	54
23515	Midwestern Indemnity Company The	13	\$15,595,845	0.6%	77
40185	Millers Classified Insurance Company	2	\$2,613,749	0.1%	71
14583	Millers First Insurance Company	2	\$2,544,773	0.1%	73
22012	Motors Insurance Corporation	0	\$42	0.0%	0
42447	National General Assurance Company	2	\$1,291,826	0.0%	143
23728	National General Insurance Company	5	\$6,144,247	0.2%	75
27944	National Insurance Association	2	\$543,779	0.0%	339
32620	National Interstate Insurance Company	1	\$350,307	0.0%	263
21881	National Surety Corporation	0	\$79,876	0.0%	0
19445	National Union Fire Ins Co of Pittsburgh	5	\$2,995,394	0.1%	154
26093	Nationwide Affinity Insurance Co Of America	14	\$16,977,042	0.6%	76
25453	Nationwide Insurance Company Of America	2	\$6,270,664	0.2%	29
23779	Nationwide Mutual Fire Insurance Company	1	\$-1,058	- 0.0%	9,999
23787	Nationwide Mutual Insurance Company	0	\$62,568	0.0%	0
12130	New South Insurance Company	3	\$2,523,475	0.1%	110
36455	Northbrook Indemnity Company	1	\$81,572	0.0%	1,131
24074	Ohio Casualty Insurance Company	0	\$74,496	0.0%	0
34940	Omni Indemnity Company	2	\$476,886	0.0%	387
39098	Omni Insurance Company	3	\$618,122	0.0%	448
21970	Onebeacon Insurance Company	0	\$113	0.0%	0
32700	Owners Insurance Company	5	\$4,618,809	0.0%	100
	* ·			0.2%	
20346	Pacific Indemnity Company	0	\$540,118 \$15,006	0.0%	0
37850	Pacific Specialty Insurance Company	0	\$15,006		0
24198	Peerless Insurance Company	0	\$149 \$60	0.0%	0
21962	Pennsylvania General Insurance Company	0	\$69 \$69,427	0.0%	0
37648	Permanent General Assurance Corporation	0	\$68,437	0.0%	0

Private Passenger Automobile Insurance Complaint Indices			
Alpha by Company			
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		Company			
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
13714	Pharmacists Mutual Insurance Company	0	\$572,323	0.0%	0
18058	Philadelphia Indemnity Insurance Company	2	\$390,844	0.0%	472
25623	Phoenix Insurance Company The	2	\$856,855	0.0%	215
24260	Progressive Casualty Insurance Company	5	\$2,978,183	0.1%	155
42994	Progressive Classic Insurance Company	15	\$9,508,806	0.3%	146
16322	Progressive Direct Insurance Company	34	\$35,935,934	1.3%	87
24279	Progressive Max Insurance Company	34	\$31,332,396	1.1%	100
42919	Progressive Northwestern Insurance Company	46	\$28,943,545	1.0%	147
37834	Progressive Preferred Insurance Company	73	\$66,092,407	2.4%	102
32786	Progressive Specialty Insurance Company	3	\$2,380,525	0.1%	116
34690	Property & Casualty Insurance Co of Hartford	21	\$13,256,836	0.5%	146
43044	Response Insurance Company	0	\$448,207	0.0%	0
26050	Response Worldwide Insurance Company	1	\$995,483	0.0%	93
27065	Rockford Mutual Insurance Company	0	\$39,027	0.0%	0
25405	Safe Auto Insurance Company	14	\$2,707,415	0.0%	477
24740	1 ,	9		0.1%	9,999
39012	Safeco Insurance Company Of America	156	\$41,188	4.4%	117
24759	Safeco Insurance Company Of Illinois		\$123,074,110	0.0%	0
	Safeco National Insurance Company	0	\$5,338 \$1,102,718	0.0%	_
40460	Sagamore Insurance Company	8	\$1,192,718		619
22543	Secura Insurance A Mutual Company	1	\$232,188	0.0%	397
10239	Secura Supreme Insurance Company	2	\$2,898,753	0.1%	64
19879	Security National Insurance Company	0	\$47,447	0.0%	0
11000	Sentinel Insurance Company Ltd	0	\$110,119	0.0%	0
24988	Sentry Insurance A Mutual Company	4	\$2,102,733	0.1%	176
23361	Shelter General Insurance Company	8	\$5,054,529	0.2%	146
23388	Shelter Mutual Insurance Company	86	\$145,341,596	5.2%	55
19070	Standard Fire Insurance Company	0	\$142,347	0.0%	0
19530	State Auto National Insurance Company	2	\$505,675	0.0%	365
25127	State Auto Property & Casualty Insurance Co	4	\$4,797,912	0.2%	77
25143	State Farm Fire & Casualty Company	39	\$44,798,493	1.6%	80
25178	State Farm Mutual Automobile Insurance Co	297	\$576,526,936	20.8%	48
22683	Teachers Insurance Company	0	\$917,370	0.0%	0
12904	Tokio Marine & Nichido Fire Insurance Co Ltd	0	\$18,684	0.0%	0
42749	Traders Insurance Company	33	\$4,018,184	0.1%	758
33014	Transport Insurance Company-Suspended-	1		•	•
28188	Travco Insurance Company	0	\$1,372,027	0.0%	0
36137	Travelers Commercial Insurance Company	2	\$1,630,927	0.1%	113
27998	Travelers Home & Marine Insurance Company	18	\$26,982,776	1.0%	62
25658	Travelers Indemnity Company	1	\$1,225	0.0%	9,999
25666	Travelers Indemnity Company Of America	0	\$239,655	0.0%	0
38130	Travelers Personal Insurance Company	8	\$5,014,502	0.2%	147
36161	Travelers Property Casualty Insurance Company	0	\$1,017,680	0.0%	0
19887	Trinity Universal Insurance Company	1	\$241,899	0.0%	382
15954	Trinity Universal Insurance Company Of Kansas	0	\$12,392	0.0%	0
41106	Triumphe Casualty Company	0	\$4,328	0.0%	0

	Private Passenger Automobile Insurance Complaint Indices Alpha by Company				
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
27120	Trumbull Insurance Company	3	\$504,940	0.0%	548
29459	Twin City Fire Insurance Company	17	\$10,388,467	0.4%	151
13021	United Fire & Casualty Company	1	\$533,231	0.0%	173
25941	United Services Automobile Association	31	\$36,894,790	1.3%	78
10915	Unitrin Direct Property & Casualty Company	14	\$2,945,517	0.1%	439
25909	Unitrin Preferred Insurance Company	2	\$1,192,990	0.0%	155
42862	Universal Casualty Company	17	\$1,856,627	0.1%	845
25968	USAA Casualty Insurance Company	9	\$21,871,512	0.8%	38
18600	USAA General Indemnity Company	2	\$2,250,578	0.1%	82
10644	Victoria Automobile Insurance Company	8	\$3,103,346	0.1%	238
42889	Victoria Fire & Casualty Company	1	\$28,557	0.0%	3,232
20397	Vigilant Insurance Company	1	\$1,086,083	0.0%	85
13137	Viking Insurance Company Of Wisconsin	20	\$6,558,250	0.2%	281
44393	West American Insurance Company	0	\$1,116,344	0.0%	0
27871	Western Agricultural Insurance Company	3	\$628,095	0.0%	441
27502	Western General Insurance Company Inc	0	\$8,827	0.0%	0
13250	Workmens Auto Insurance Company	8	\$1,308,807	0.0%	564
27090	Young America Insurance Company	4	\$3,334,211	0.1%	111
	Total	3,000	\$2,768,694,291	100.0%	•

Homeowners Insurance

Complaint Indices

Homeowners 1	Insurance Complaint Indices
A1 ₁	nha hy Company

Alpha by Company					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
20700	A D C	0	\$120.0F2		0
20699	Ace Property & Casualty Insurance Company	0	\$120,052	0.0%	0
14184	Acuity A Mutual Insurance Company	0	\$1,776,129	0.1%	0
10324	Addison Insurance Company	0	\$502,272	0.0%	0
33898	Aegis Security Insurance Company	0	\$138,927	0.0%	0
10014	Affiliated FM Insurance Company	0	\$2,122,484	0.2%	0
19402	AIG Casualty Company	0	\$224,217	0.0%	0
19186	Alliance Insurance Company Inc	5	\$2,391,096	0.2%	180
42579	Allied Property & Casualty Insurance Company	14	\$10,561,428	0.8%	114
19240	Allstate Indemnity Company	44	\$24,831,287	1.8%	153
19232	Allstate Insurance Company	44	\$20,011,586	1.4%	189
17230	Allstate Property & Casualty Insurance Company	38	\$27,546,469	2.0%	119
19100	AMCO Insurance Company	9	\$17,696,280	1.3%	44
21849	American Automobile Insurance Company	3	\$9,677,171	0.7%	27
10111	American Bankers Insurance Company Of FL	13	\$1,742,234	0.1%	643
19690	American Economy Insurance Company	0	\$304,028	0.0%	0
23450	American Family Home Insurance Company	4	\$1,636,501	0.1%	211
19275	American Family Mutual Insurance Company	211	\$248,925,441	17.8%	73
24066	American Fire & Casualty Company	0	\$441,112	0.0%	0
19380	American Home Assurance Company	1	\$614,378	0.0%	140
21857	American Insurance Company The	1	\$1,299,477	0.1%	66
32220	American International Insurance Company	0	\$2,195,559	0.2%	0
23469	American Modern Home Insurance Co	11	\$4,163,571	0.3%	228
38652	American Modern Select Insurance Company	2	\$1,154,959	0.1%	149
39942	American National General Insurance Company	1	\$241,887	0.1%	356
28401	American National Property & Casualty Co	13	\$11,136,624	0.8%	101
19615				0.676	267
42978	American Reliable Insurance Company	3 8	\$966,430	1.1%	
	American Security Insurance Company		\$14,957,752		46
41998	American Southern Home Insurance Company	0	\$36,170	0.0%	0
19704	American States Insurance Company	2	\$1,763,727	0.1%	98
19488	Amerisure Insurance Company	0	\$597	0.0%	0
23396	Amerisure Mutual Insurance Company	0	\$10,801	0.0%	0
27928	Amex Assurance Company	1	\$273,602	0.0%	315
19976	AMICA Mutual Insurance Company	1	\$1,528,284	0.1%	56
41459	Armed Forces Insurance Exchange	0	\$1,454,740	0.1%	0
21865	Associated Indemnity Corporation	1	\$447,010	0.0%	193
19895	Atlantic Mutual Insurance Company-Suspended-	0	\$298,280	0.0%	0
13412	Austin Mutual Insurance Company	0	\$104,770	0.0%	0
27235	Auto Club Family Insurance Company	51	\$31,947,485	2.3%	138
18988	Auto Owners Insurance Company	10	\$15,530,174	1.1%	55
19062	Automobile Ins Co Of Hartford CT	5	\$3,273,159	0.2%	132
33022	AXA Insurance Company	0	\$117,595	0.0%	0
24813	Balboa Insurance Company	10	\$3,295,814	0.2%	261
18279	Bankers Standard Insurance Company	0	\$127,129	0.0%	0
37540	Beazley Insurance Company Inc	0	\$5,632	0.0%	0
41394	Benchmark Insurance Company	0	\$479,512	0.0%	0

Homeowners 1	Insurance Complaint Indices
A1-	nha hy Company

Alpha by Company					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006-	Complaint Index
			***************************************	2008	
20117	California Casualty Indemnity Exchange	3	\$844,483	0.1%	306
20125	California Casualty Insurance Company	0	\$277	0.0%	0
15725	Cameron Mutual Insurance Company	18	\$17,003,626	1.2%	91
19909	Centennial Insurance Company-Suspended-	0	\$255,276	0.0%	0
25615	Charter Oak Fire Insurance Co The	3	\$476,752	0.0%	542
10052	Chubb National Insurance Company	0	\$595,473	0.0%	0
18767	Church Mutual Insurance Company	0	\$157,431	0.0%	0
10677	Cincinnati Insurance Company The	3	\$4,729,508	0.3%	55
31534	Citizens Insurance Company Of America	0	\$34,133	0.0%	0
10315	Civic Property & Casualty Co	6	\$1,958,644	0.1%	264
20532	Clarendon National Insurance Company	0	\$10,492	0.0%	0
40371	Columbia Mutual Insurance Company	3	\$4,959,654	0.4%	52
19640	Columbia National Insurance Company	3	\$3,995,990	0.3%	65
10204	Consumers Insurance USA Inc	0	\$148,485	0.0%	0
20990	Country Mutual Insurance Company	21	\$9,200,264	0.7%	197
10847	Cumis Insurance Society Inc	0	\$181	0.0%	0
42587	Depositors Insurance Company	1	\$1,708,308	0.1%	50
42048	Diamond State Insurance Company	0	\$247,434	0.0%	0
40649	Economy Premier Assurance Company	3	\$4,120,550	0.3%	63
21261	Electric Insurance Company	4	\$2,609,145	0.2%	132
21407	Emcasco Insurance Company	0	\$330,898	0.0%	0
21326	Empire Fire & Marine Insurance Co	4	\$255,670	0.0%	1,348
21415	Employers Mutual Casualty Company	0	\$130,767	0.0%	0
15130	Encompass Indemnity Company	11	\$2,956,872	0.2%	320
10071	Encompass Insurance Company Of America	3	\$1,741,693	0.1%	148
10318	Exact Property & Casualty	0	\$29,541	0.0%	0
21482	Factory Mutual Insurance Company	0	\$9,854,805	0.7%	0
12345	Farm Bureau New Horizons Ins Co of MO	0	\$929,791	0.1%	0
26859	Farm Bureau Town & Country Ins Co Of MO	96	\$56,297,348	4.0%	147
19194	Farmers Alliance Mutual Insurance Company	13	\$4,517,096	0.3%	248
21652	Farmers Insurance Exchange	26	\$9,559,611	0.7%	234
16381	Farmers Union Cooperative Insurance Company	0	\$2,689	0.0%	0
13838	Farmland Mutual Insurance Company	0	\$2,399	0.0%	0
20281	Federal Insurance Company	1	\$1,720,011	0.1%	50
11118	Federated Rural Electric Insurance Exchange	0	\$1,263,908	0.1%	0
39306	Fidelity & Deposit Company Maryland	0	\$59,398	0.0%	0
25180	Fidelity National Insurance Company	30	\$5,451,498	0.4%	474
21660		39		2.0%	122
	Fire Insurance Exchange		\$27,471,981		
21873	Firemans Fund Insurance Company	1	\$3,819,575 \$66,581	0.3%	23
10336	First Acceptance Insurance Company Inc	0	\$66,581 \$22,954	0.0%	0
37710	First American Property & Casualty Ins Co	0	\$23,854	0.0%	0
33588	First Liberty Insurance Corp The	0	\$223	0.0%	0
24724	First National Insurance Company Of America	0	\$58,167	0.0%	0
11185	Foremost Insurance Company	20	\$8,553,062	0.6%	201
11800	Foremost Property & Casualty Insurance Co	5	\$1,626,638	0.1%	265

Homeowners	Insurance Complaint Indices
A1	nha by Company

	Alpha by Company						
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index		
41513	Foremost Signature Insurance Company	5	\$4,849,614	0.3%	89		
21253	Garrison Property & Casualty Insurance Co	0	\$322,812	0.0%	0		
24732	General Insurance Company Of America	0	\$322,500	0.0%	0		
11231	Generali U S Branch	0	\$656,758	0.0%	0		
41343	Gerling America Insurance Company	0		0.0%	0		
		-	\$43,219 \$1,265,857				
23809	Granite State Insurance Company	0	\$1,265,857	0.1%	0		
26344	Great American Assurance Company	0	\$12,649	0.0%	0		
16691	Great American Insurance Company	0	\$118,748	0.0%	0		
22136	Great American Insurance Company Of NY	0	\$14,711	0.0%	0		
20303	Great Northern Insurance Company	0	\$7,946,875	0.6%	0		
42331	Guideone America Insurance Company	1	\$151,907	0.0%	567		
15032	Guideone Mutual Insurance Company	17	\$3,079,464	0.2%	476		
14559	Guideone Specialty Mutual Insurance Company	0	\$29,814	0.0%	0		
22292	Hanover Insurance Company The	0	\$41,530	0.0%	0		
10829	Harbor Point Reinsurance US Inc	0	\$9	0.0%	0		
26433	Harco National Insurance Company	0	\$149,826	0.0%	0		
22357	Hartford Accident & Indemnity Co	1	\$116,541	0.0%	739		
29424	Hartford Casualty Insurance Co	1	\$1,167,761	0.1%	74		
19682	Hartford Fire Insurance Company	1	\$174,476	0.0%	494		
30104	Hartford Underwriters Insurance Company	12	\$8,562,037	0.6%	121		
31550	Haulers Insurance Company Inc	0	\$132,471	0.0%	0		
20419	Homesite Indemnity Company	39	\$5,281,305	0.4%	636		
22578	Horace Mann Insurance Company	1	\$372,861	0.0%	231		
29068	IDS Property Casualty Insurance Company	0	\$1,085,095	0.1%	0		
23817	Illinois National Insurance Company	0	\$7,845	0.0%	0		
43575	Indemnity Insurance Co Of North America	0	\$1,350,042	0.1%	0		
29831	Independent Mutual Fire Insurance Company	0	\$71,161	0.0%	0		
19429	Insurance Company Of The State Of PA	0	\$936,834	0.1%	0		
10914	Kemper Independence Insurance Company	1	\$886,661	0.1%	97		
23035	Liberty Mutual Fire Insurance Company	19	\$19,372,896	1.4%	84		
14400	Lititz Mutual Insurance Company	10	\$7,844,612	0.6%	110		
28932	Markel American Insurance Company	0	\$101,480	0.0%	0		
38970	Markel Insurance Company	0	\$51,418	0.0%	0		
22306	Massachusetts Bay Insurance Company	2	\$62,205	0.0%	2,770		
31968	Merastar Insurance Company	0	\$48,875	0.0%	0		
10502	Meridian Citizens Mutual Insurance Company	0	\$14,070	0.0%	0		
24821	Meritplan Insurance Company	0	\$252,759	0.0%	0		
34339	Metropolitan Group Property & Casualty Ins Co	3	\$1,825,159	0.1%	142		
26298	Metropolitan Property & Casualty Insurance Co	12	\$4,723,421	0.176	219		
20298	MFS Mutual Insurance Company	0	\$9,993	0.5%	0		
				2.9%			
21687	Mid-Heavy Insurance Company	62	\$40,385,701		132		
23434	Middlesex Insurance Company	1	\$1,272,361	0.1%	68		
23515	Millon Classified Insurance Company	11	\$11,426,099	0.8%	83		
40185	Millers Classified Insurance Company	2	\$1,740,033	0.1%	99		
14583	Millers First Insurance Company	5	\$2,257,725	0.2%	191		

Homeowners	Insurance Complaint Indices				
Alpha by Company					

Alpha by Company						
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006-	Complaint Index	
00102	M. D. T. B. T. E. II.	12	#2 F42 002	2008	440	
00103	Missouri Property Insurance Placement Facility	13	\$2,542,902	0.2%	440	
23655	Modern Service Insurance Company	0	\$3,768	0.0%	0	
11878	Mutualaid Exchange	0	\$385,808	0.0%	0	
11991	National Casualty Company	5	\$1,379,432	0.1%	312	
15474	National Lloyds Insurance Company	6	\$1,389,464	0.1%	372	
21881	National Surety Corporation	0	\$824,796	0.1%	0	
19445	National Union Fire Ins Co of Pittsburgh	0	\$648	0.0%	0	
26093	Nationwide Affinity Insurance Co Of America	1	\$4,304,178	0.3%	20	
28223	Nationwide Agribusiness Insurance Company	0	\$19,940	0.0%	0	
25453	Nationwide Insurance Company Of America	4	\$2,584,083	0.2%	133	
23787	Nationwide Mutual Insurance Company	4	\$6,878,110	0.5%	50	
10317	Neighborhood Spirit Property & Casualty Co	1	\$101,824	0.0%	846	
23841	New Hampshire Insurance Company	0	\$22,272	0.0%	0	
21105	North River Insurance Company The	0	\$4,819	0.0%	0	
34630	Oak River Insurance Company	0	\$348,160	0.0%	0	
24074	Ohio Casualty Insurance Company	1	\$421,662	0.0%	204	
36625	Old Reliable Casualty Company	23	\$3,326,734	0.2%	596	
21970	Onebeacon Insurance Company	0	\$2,993,059	0.2%	0	
32700	Owners Insurance Company	2	\$2,522,102	0.2%	68	
20346	Pacific Indemnity Company	1	\$2,647,591	0.2%	33	
32859	Penn America Insurance Company	0	\$1,356	0.0%	0	
14982	Penn Millers Insurance Company	0	\$23,071	0.0%	0	
14974	Pennsylvania Lumbermens Mutual Insurance Co	0	\$723,103	0.1%	0	
13714	Pharmacists Mutual Insurance Company	0	\$469,397	0.0%	0	
18058	Philadelphia Indemnity Insurance Company	0	\$23,479	0.0%	0	
37257	Praetorian Insurance Company	1	\$15,256	0.0%	5,647	
24260	Progressive Casualty Insurance Company	19	\$5,639,822	0.4%	290	
37834	Progressive Preferred Insurance Company	0	\$148,351	0.0%	0	
34690	Property & Casualty Insurance Co of Hartford	12	\$8,562,778	0.6%	121	
39217	QBE Insurance Corporation	0	\$370,399	0.0%	0	
11853		0	\$370 , 399	0.0%	0	
	Ranchers & Farmers Insurance Company					
24449	Regent Insurance Company	0	\$305	0.0%	0	
27065	Rockford Mutual Insurance Company	0	\$438,309 \$37,700,271	0.0%	0	
24740	Safeco Insurance Company Of America	42	\$37,790,271	2.7%	96	
16551	Savers Property & Casualty Insurance Company	0	\$8,021	0.0%	0	
15580	Scottsdale Indemnity Company	0	\$5,515	0.0%	0	
22543	Secura Insurance A Mutual Company	3	\$678,524	0.0%	381	
10239	Secura Supreme Insurance Company	1	\$1,857,000	0.1%	46	
19879	Security National Insurance Company	0	\$93,338	0.0%	0	
10936	Seneca Insurance Company Inc	0	\$48,383	0.0%	0	
11000	Sentinel Insurance Company Ltd	9	\$2,764,697	0.2%	280	
24988	Sentry Insurance A Mutual Company	6	\$2,249,086	0.2%	230	
23361	Shelter General Insurance Company	2	\$1,200,613	0.1%	144	
23388	Shelter Mutual Insurance Company	114	\$103,282,617	7.4%	95	
11126	Sompo Japan Insurance Company Of America	0	\$25,812	0.0%	0	

	Homeowners Insurance Complaint Indices Alpha by Company					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index	
19216	Southern Insurance Company	1	\$664,932	0.0%	130	
24775	St Paul Guardian Insurance Company	0	\$9,592	0.0%	0	
19070	Standard Fire Insurance Company	45	\$25,879,122	1.8%	150	
42986	Standard Guaranty Insurance Company	0	\$137,778	0.0%	0	
40045	Starnet Insurance Company	0	\$42,365	0.0%	0	
25127	State Auto Property & Casualty Insurance Co	4	\$5,359,641	0.4%	64	
25143	State Farm Fire & Casualty Company	246	\$332,364,650	23.7%	64	
12831	State National Insurance Company Inc	0	\$19,606	0.0%	0	
22683	Teachers Insurance Company	0	\$1,060,018	0.1%	0	
12904	Tokio Marine & Nichido Fire Insurance Co Ltd	0	\$87,596	0.0%	0	
28886	Transguard Ins Co of America Inc	0	\$39,241	0.0%	0	
27998	Travelers Home & Marine Insurance Company	11	\$8,597,556	0.6%	110	
25658	Travelers Indemnity Company	1	\$348,833	0.0%	247	
25666	Travelers Indemnity Company Of America	2	\$1,323,792	0.1%	130	
25682	Travelers Indemnity Company Of Connecticut	0	\$126,099	0.0%	0	
36161	Travelers Property Casualty Insurance Company	0	\$208,316	0.0%	0	
19887	Trinity Universal Insurance Company	0	\$6,652	0.0%	0	
15954	Trinity Universal Insurance Company Of Kansas	0	\$26,132	0.0%	0	
29459	Twin City Fire Insurance Company	1	\$264,500	0.0%	326	
21423	Union Insurance Company Of Providence	2	\$637,177	0.0%	270	
13021	United Fire & Casualty Company	5	\$819,606	0.1%	526	
21776	United Security Insurance Company	0	\$8,557	0.0%	0	
25941	United Services Automobile Association	5	\$17,925,101	1.3%	24	
21113	United States Fire Insurance Company	0	\$2,996,156	0.2%	0	
25909	Unitrin Preferred Insurance Company	1	\$884,616	0.1%	97	
25968	USAA Casualty Insurance Company	2	\$8,697,838	0.6%	20	
18600	USAA General Indemnity Company	0	\$192,000	0.0%	0	
20397	Vigilant Insurance Company	1	\$3,281,458	0.2%	26	
44393	West American Insurance Company	1	\$1,042,439	0.1%	83	
21121	Westchester Fire Insurance Company	0	\$1,113,221	0.1%	0	
24112	Westfield Insurance Company	0	\$17,878	0.0%	0	

1,627

Total

\$1,401,697,926

100.0%

Accident & Health Insurance

Complaint Indices

Accident and Health Insurance Complaint Indices Alpha by Company					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
77879	5 Star Life Insurance Company	0	\$1,919	0.0%	0
35963	A F & L Insurance Company-Suspended-	13	" ,		
71854	AAA Life Insurance Company	0	\$334,052	0.0%	0
60038	Acacia Life Insurance Co	0	\$374	0.0%	0
22667	Ace American Insurance Company	2	\$9,916,678	0.2%	37
71390	Admiral Life Insurance Company Of America	0	\$2,746,418	0.0%	0
33898	Aegis Security Insurance Company	0	\$184,978	0.0%	0
72052	Aetna Health Insurance Company	1	\$773,544	0.0%	238
60054	Aetna Life Insurance Company	45	\$135,917,059	2.2%	61
66842	AIG Life Insurance Company	2	\$7,687,674	0.1%	48
20796	AIG Premier Insurance Company	0	\$51,513	0.0%	0
90611	Allianz Life Insurance Co Of North America	0	\$5,863,125	0.1%	0
60186	Allstate Life Insurance Company	1	\$1,023,842	0.0%	180
70874	Allstate Life Insurance Company Of New York	0	\$1,523	0.0%	0
67369	Alta Health & Life Insurance Company	0	\$636,085	0.0%	0
19720	American Alternative Insurance Corporation	1	\$669,649	0.0%	275
10111	American Bankers Insurance Company Of FL	0	\$40,699	0.0%	0
60275	American Bankers Life Assurance Of Florida	3	\$2,885,147	0.0%	191
60291	American Capitol Insurance Company	0	\$10,868	0.0%	0
20427	American Casualty Company Of Reading PA	0	\$53	0.0%	0
60305	American Community Mutual Insurance Co	79	\$42,753,793	0.7%	340
12321	American Continental Insurance Company	0	\$849,114	0.0%	0
60380	American Family Life Assurance Co of Col.	41	\$76,529,199	1.2%	99
19275	American Family Mutual Insurance Company	13	\$32,486,788	0.5%	74
98736	American Federated Life Insurance Company	0	\$153,111	0.0%	0
60410	American Fidelity Assurance Company	3	\$9,789,083	0.2%	56
68373	American General Assurance Company	4	\$752,611	0.0%	977
66672	American General Life & Accident Insurance Co	2	\$1,489,909	0.0%	247
60488	American General Life Insurance Co	1	\$664,347	0.0%	277
13331	American Hardware Mutual Insurance Company	0	\$1,864	0.0%	0
60518	American Health & Life Insurance Company	3	\$2,267,215	0.0%	243
60534	American Heritage Life Insurance Company	12	\$6,433,232	0.1%	343
19380	American Home Assurance Company	0	\$8,779,490	0.1%	0
60542	American Home Life Insurance Company	0	\$1,278	0.0%	0
60577	American Income Life Insurance Co	3	\$1,439,429	0.0%	383
60607	American International Life Assurance Of NY	0	\$693	0.0%	0
81418	American Medical & Life Insurance Company	0	\$155,283	0.0%	0

Accident and Health Insurance Complaint Indices	
Alpha by Company	

Code	Name	Complaints	Average Annual	Average	Complaint
		2006-2008	Premium 2006-	Market	Index
			2008	Share 2006-	
				2008	
97179	American Medical Security Life Ins Co	17	\$13,687,567	0.2%	228
65811	American Modern Life Insurance Company	1	\$1,113,502	0.0%	165
60739	American National Insurance Company	3	\$2,794,530	0.0%	197
71773	American National Life Ins Co Of TX	4	\$5,501,871	0.1%	134
81078	American Network Insurance Company	0	\$13,410	0.0%	0
60763	American Pioneer Life Insurance Company	13	\$6,068,479	0.1%	394
80624	American Progressive Life & Health Ins Co	0	\$17,903	0.0%	0
60801	American Public Life Insurance Company	1	\$466,337	0.0%	394
67679	American Republic Corp Insurance Company	0	\$94,177	0.0%	0
60836	American Republic Insurance Company	16	\$31,052,930	0.5%	95
42978	American Security Insurance Company	0	\$125,880	0.0%	0
17965	American Sentinel Insurance Company	0	\$1,044,125	0.0%	0
19704	American States Insurance Company	0	\$54,423	0.0%	0
92649	American Underwriters Life Insurance Company	0	\$513,222	0.0%	0
60895	American United Life Insurance Co	0	\$3,247,606	0.1%	0
61999	Americo Financial Life & Annuity Ins Co	1	\$2,485	0.0%	9,999
61301	Ameritas Life Insurance Corp	6	\$7,371,158	0.1%	150
27928	Amex Assurance Company	0	\$1,281,324	0.0%	0
55662	Anthem Blue Cross & Blue Shield-Withdrew-	1	, , , , , , , , , , , , , , , , , , , ,		
28207	Anthem Insurance Companies Inc	0	\$37,068,185	0.6%	0
61069	Anthem Life Insurance Company	0	\$1,655,268	0.0%	0
11150	Arch Insurance Company	0	\$148,690	0.0%	0
56499	Assured Life Association	0	\$11	0.0%	0
71439	Assurity Life Insurance Company	3	\$1,194,899	0.0%	462
61093	Atlanta Life Insurance Company	0	\$5,254	0.0%	0
84522	Auto Club Life Insurance Company	0	\$91,743	0.0%	0
61190	Auto Owners Life Insurance Company	0	\$212,541	0.0%	0
10367	Avemco Insurance Company	0	\$220	0.0%	0
61689	Aviva Life & Annuity Company	0	\$67,847	0.0%	0
62944	AXA Equitable Life Insurance Company	0	\$764,766	0.0%	0
24813	Balboa Insurance Company	0	\$282	0.0%	0
68160	Balboa Life Insurance Company	0	\$235,608	0.0%	0
61212	Baltimore Life Insurance Company The	0	\$10,626	0.0%	0
61239	Bankers Fidelity Life Insurance Co	0	\$411,036	0.0%	0
61263	Bankers Life & Casualty Company	79	\$44,079,539	0.7%	330
94250	Banner Life Insurance Company	0	\$107	0.0%	0
38245	BCS Insurance Company	0	\$1,461,578	0.0%	0
80985	BCS Life Insurance Company	0	\$62,150	0.0%	0
41394	Benchmark Insurance Company	0	\$2,305,681	0.0%	0
69752	Benicorp Insurance Company-Suspended-	36	\$5,458,712	0.1%	1,213
71714	Berkshire Life Insurance Company Of America	0	\$2,409,698	0.0%	0
90638	Best Life & Health Insurance Company	0	\$189,312	0.0%	0
47171	Blue Cross & Blue Shield Of Kansas City	190	\$568,651,022	9.0%	61
61476	Boston Mutual Life Insurance Company	1	\$1,181,824	0.0%	156
74900	Brokers National Life Assurance Company	0	\$1,823,054	0.0%	0

Accident and Health Insurance Complaint Indices	
Alpha by Company	

	Alpha by Company						
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index		
81000	Cambridge Life Insurance Company	0	\$627,578	0.0%	0		
80659		0		0.0%	_		
10472	Canada Life Assurance Company Capitol Indemnity Corporation		\$787,516 \$97,549	0.0%	$0 \\ 0$		
	1 , 1	0			ŭ		
71455	Cardif Life Insurance Company	2	\$806,257	0.0%	456		
56030	Catholic Knights	0	\$1,968	0.0%	0		
57487	Catholic Order Of Foresters	0	\$16,487	0.0%	0		
80799	Celtic Insurance Company	9	\$1,766,018	0.0%	937		
63541	Central Benefits National Life Ins Co	0	\$745	0.0%	0		
61727	Central Reserve Life Insurance Company	16	\$4,859,939	0.1%	605		
61735	Central Security Life Insurance Co	0	\$12,606	0.0%	0		
61751	Central States Health & Life Co Of Omaha	1	\$2,772,681	0.0%	66		
34274	Central States Indemnity Company Of Omaha	0	\$785,237	0.0%	0		
61883	Central United Life Insurance Company	24	\$2,503,022	0.0%	1,763		
80896	Centre Life Insurance Company	0	\$252,712	0.0%	0		
62383	Centurion Life Insurance Company	0	\$81,725	0.0%	0		
61824	Cherokee National Life Insurance Co	0	\$55,967	0.0%	0		
61832	Chesapeake Life Insurance Company The	1	\$1,648,414	0.0%	112		
61859	Christian Fidelity Life Insurance Co	2	\$17,745,133	0.3%	21		
71463	Cica Life Insurance Company Of America	0	\$2,903	0.0%	0		
64548	CIGNA Life Insurance Company of NY	0	\$7,335	0.0%	0		
10677	Cincinnati Insurance Company The	0	\$15	0.0%	0		
76236	Cincinnati Life Insurance Company The	0	\$63,017	0.0%	0		
61921	Citizens Security Life Ins Co	0	\$27,834	0.0%	0		
20532	Clarendon National Insurance Company	0	\$85,120	0.0%	0		
62049	Colonial Life & Accident Ins Co	4	\$10,290,721	0.2%	71		
62065	Colonial Penn Life Insurance Company	0	\$367,193	0.0%	0		
84786	Colorado Bankers Life Ins Co	0	\$7,484	0.0%	0		
76023	Columbian Life Insurance Company	2	\$1,073,755	0.0%	343		
99937	Columbus Life Insurance Company	0	\$987	0.0%	0		
62146	Combined Insurance Co Of America	18		0.4%			
81426	Commercial Travelers Mutual Insurance Co		\$22,251,364	0.4%	149 0		
		0	\$105,851 \$212.055				
84824	Commonwealth Annuity & Life Insurance Co	0	\$312,955	0.0%	0		
92681	Community Health Plan Insurance Company	8	\$9,027,478	0.1%	163		
77828	Companion Life Insurance Company	0	\$4,511,289	0.1%	0		
60984	Compbenefits Insurance Company	3	\$1,428,961	0.0%	386		
62308	Connecticut General Life Ins Co	20	\$55,499,646	0.9%	66		
78174	Conseco Health Insurance Company	31	\$15,304,932	0.2%	372		
60682	Conseco Insurance Company	2	\$1,667,148	0.0%	221		
65900	Conseco Life Insurance Co	1	\$50,176	0.0%	3,665		
62359	Constitution Life Insurance Company	0	\$90,623	0.0%	0		
71730	Continental American Insurance Company	0	\$581,524	0.0%	0		
62413	Continental Assurance Company	2	\$254,217	0.0%	1,447		
20443	Continental Casualty Company	7	\$8,372,555	0.1%	154		
71404	Continental General Insurance Company	17	\$6,106,710	0.1%	512		
68500	Continental Life Ins Co Of Brentwood TN	6	\$22,748,618	0.4%	49		

Accident and Health Insurance Complaint Indices	
Alpha by Company	

	Alpha by				
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006-	Complaint Index
				2008	
62553	Country Life Insurance Company	1	\$612,869	0.0%	300
81973	Coventry Health & Life Insurance Company	85	\$326,837,780	5.2%	48
60040	Cox Health Systems Insurance Company	32	\$56,786,485	0.9%	104
56634	Croatian Fraternal Union Of America	0	\$1,056	0.0%	0
80675	Crown Life Insurance Company	0	\$87,838	0.0%	0
56138	CSA Fraternal Life	0	\$867	0.0%	0
62626	CUNA Mutual Insurance Society	4	\$7,433,905	0.1%	99
35408	Delos Insurance Company	1	\$3,938,748	0.1%	47
73474	Dentegra Insurance Company	1	\$1,816,667	0.0%	101
62928	EMC National Life Company	1	\$1,142,246	0.0%	161
21326	Empire Fire & Marine Insurance Co	0	\$90,669	0.0%	0
12747	Envision Insurance Company	0	\$209,885	0.0%	0
64149	Epic Life Insurance Company The	0	\$227,110	0.0%	0
62952	Equitable Life & Casualty Insurance Company	15	\$14,698,634	0.2%	188
25518	Fairmont Premier Insurance Company	3	\$775,072	0.0%	712
70742	Family Benefit Life Insurance Company	0	\$4,360	0.0%	0
77968	Family Heritage Life Insurance Co Of America	2	\$1,275,008	0.0%	288
63053	Family Life Insurance Company	0	\$163	0.0%	0
63118	Farm Bureau Life Ins Co of MO	0	\$270,143	0.0%	0
13897	Farmers Mutual Hail Insurance Company Of IA	0	\$375	0.0%	0
63177	Farmers New World Life Insurance Co	0	\$409,328	0.0%	0
20281	Federal Insurance Company	0	\$3,020,638	0.0%	0
63223	Federal Life Insurance Company	0	\$2,748	0.0%	0
63258	Federated Life Insurance Company	0	\$548,952	0.0%	0
13935	Federated Mutual Insurance Company	8	\$20,988,686	0.3%	70
63290	Fidelity Life Association A Legal Reserve Life Ins	0	\$1,438	0.0%	0
71870	,	2	\$8,873,456	0.076	41
69140	Fidelity Security Life Insurance Company First Allmerica Financial Life Insurance Co	0		0.176	
			\$5,093		0
64696	First Continental Life & Accident Insurance Co	3	\$1,612,266	0.0%	342
90328	First Health Life & Health Insurance Company	1	\$53,643,790	0.9%	3
71129	Fort Dearborn Life Insurance Company	2	\$2,370,901	0.0%	155
62324	Freedom Life Insurance Company Of America	1	\$517,597	0.0%	355
63665	General American Life Insurance Company	0	\$820,271	0.0%	0
65536	Genworth Life & Annuity Insurance Company	2	\$4,902,632	0.1%	75 74
70025	Genworth Life Insurance Company	13	\$33,670,196	0.5%	71
70939	Gerber Life Insurance Company	0	\$3,783,483	0.1%	0
91472	Globe Life & Accident Insurance Company	4	\$1,499,962	0.0%	490
62286	Golden Rule Insurance Company	52	\$48,791,451	0.8%	196
22063	Government Employees Insurance Co	0	\$1,584	0.0%	0
63967	Government Personnel Mutual Life Ins Co	0	\$44,940	0.0%	0
16691	Great American Insurance Company	0	\$1,576,405	0.0%	0
63312	Great American Life Insurance Company	0	\$656,706	0.0%	0
90212	Great Southern Life Insurance Company	0	\$20,368	0.0%	0
80705	Great West Life Assurance Company	0	\$182,513	0.0%	0
68322	Great-West Life & Annuity Insurance Company	1	\$19,124,578	0.3%	10

Accident and Health Insurance Complaint Indices	
Alpha by Company	

	Alpha by		Alpha by Company						
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index				
64211	Guarantee Trust Life Insurance Co	13	\$9,826,227	0.2%	243				
64238	Guaranty Income Life Insurance Company	0	\$31,565	0.0%	0				
64246	Guardian Life Insurance Company Of America	21	\$62,425,799	1.0%	62				
19682	Hartford Fire Insurance Company	1	\$2,023	0.0%	9,999				
70815	Hartford Life & Accident Insurance Company	13	\$57,346,627	0.9%	42				
71153	Hartford Life & Annuity Insurance Company	0	\$19,499	0.0%	0				
88072	Hartford Life Insurance Company	1	\$4,010,115	0.1%	46				
92711	HCC Life Insurance Company	0	\$13,060,672	0.2%	0				
78611	HCSC Insurance Services Company	0	\$231,381	0.0%	0				
70670	Health Care Service Corporation	0	\$1,548,909	0.0%	0				
66141	Health Net Life Insurance Company	0	\$2,396,327	0.0%	0				
78972	Healthy Alliance Life Insurance Co	1,090	\$1,497,904,678	23.7%	134				
32077	Heritage Casualty Insurance Company	0	\$24,717	0.0%	0				
93440	HM Life Insurance Company	0	\$3,133,998	0.0%	0				
64513	Horace Mann Life Insurance Company	0	\$75,823	0.0%	0				
93777	Household Life Insurance Company	2	\$2,715,486	0.0%	135				
73288	Humana Insurance Company	59	\$342,099,675	5.4%	32				
70580	Humanadental Insurance Company	0	\$6,307,424	0.1%	0				
97764	Idealife Insurance Company	0	\$180,205	0.0%	0				
64580	Illinois Mutual Life Insurance Company	2	\$1,792,279	0.0%	205				
63533	Imerica Life & Health Insurance Company	0	\$12,186	0.0%	0				
26581	Independence American Insurance Company	0	\$55,811	0.0%	0				
58068	Independent Order Of Foresters The	0	\$2,747	0.0%	0				
81779	Individual Assurance Co Life Health & Accident	1	\$1,618,885	0.0%	114				
86509	ING Life Insurance & Annuity Company	0	\$1,254	0.0%	0				
80942	ING USA Annuity & Life Ins Co	0	\$16,798	0.0%	0				
19429	Insurance Company Of The State Of PA	0	\$45,098	0.0%	0				
85189	Investors Consolidated Insurance Company	0	\$27	0.0%	0				
64904	Investors Heritage Life Insurance Company	1	\$1,681	0.0%	9,999				
63487	Investors Life Insurance Co Of North America	0	\$2,994	0.0%	0				
89958	J M I C Life Insurance Company	0	\$32,987	0.0%	0				
65056	Jackson National Life Insurance Company	0		0.0%	0				
11630	Jefferson Insurance Company		\$103,111 \$27,473	0.0%	_				
		0	\$27,473 \$168,632		0				
64017	Jefferson National Life Insurance Company	0		0.0%	0				
65080	John Alden Life Insurance Company	20	\$11,622,310	0.2%	316				
65099	John Hancock Life Insurance Company	8	\$23,064,111	0.4%	64				
65838	John Hancock Life Insurance Company	0	\$109	0.0%	0				
65110	Kanawha Insurance Company	0	\$3,321,014	0.1%	0				
65129	Kansas City Life Insurance Company	2	\$3,715,336	0.1%	99				
58033	Knights Of Columbus	0	\$1,496,613	0.0%	0				
65242	Lafayette Life Insurance Company The	0	\$1,429,537	0.0%	0				
71595	Lewer Life Insurance Company	0	\$10,764	0.0%	0				
65315	Liberty Life Assurance Company Of Boston	2	\$1,962,987	0.0%	187				
61492	Liberty Life Insurance Company	1	\$1,170,032	0.0%	157				
23043	Liberty Mutual Insurance Company	0	\$3,983	0.0%	0				

Accident and Health Insurance Complaint Indices	
Alpha by Company	

	Alpha by Company						
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index		
65331	Liberty National Life Insurance Company	0	\$97,769	0.0%	0		
65498	Life Insurance Company Of North America	6	\$17,301,541	0.3%	64		
65528	Life Insurance Company Of The Southwest	0	\$306	0.0%	0		
77720	Lifesecure Insurance Company	0	\$12,816	0.0%	0		
65595	Lincoln Benefit Life Company	2	\$4,703,330	0.1%	78		
65927	Lincoln Heritage Life Insurance Company	0	\$105,462	0.176	0		
62057		0	\$103, 4 02	0.0%	0		
	Lincoln Life & Annuity Company Of New York	-					
65676	Lincoln National Life Insurance Company	10	\$16,408,128	0.3%	112		
68446	Longevity Insurance Company	0	\$14,274	0.0%	0		
65722	Loyal American Life Insurance Company	4	\$682,562	0.0%	1,078		
65781	Madison National Life Insurance Company Inc	1	\$1,377,875	0.0%	133		
61018	Magna Insurance Company	0	\$3,596	0.0%	0		
60321	Mamsi Life & Health Insurance Company	1	\$17,609	0.0%	9,999		
38970	Markel Insurance Company	1	\$839,169	0.0%	219		
71072	Marquette National Life Insurance Company	1	\$1,111,360	0.0%	165		
65935	Massachusetts Mutual Life Insurance Company	1	\$8,578,439	0.1%	21		
69515	Medamerica Insurance Company	0	\$298,136	0.0%	0		
63762	Medco Containment Life Insurance Company	0	\$4,027,760	0.1%	0		
74217	Medical Savings Insurance Company-Suspended-	1					
31119	Medico Insurance Company	6	\$4,560,229	0.1%	242		
71471	Medico Life Insurance Company	0	\$1,293,105	0.0%	0		
97055	Mega Life & Health Insurance Company The	34	\$12,405,159	0.2%	504		
86126	Members Life Insurance Company	0	\$66	0.0%	0		
11529	Mercy Health Plans	53	\$190,137,164	3.0%	51		
65951	Merit Life Insurance Co	0	\$1,108,926	0.0%	0		
87726	Metlife Insurance Company Of Connecticut	2	\$1,949,454	0.0%	189		
65978	Metropolitan Life Insurance Company	20	\$85,202,509	1.4%	43		
66044	Midland National Life Insurance Company	0	\$8,941	0.0%	0		
66087	Midwest National Life Insurance Co Of TN	7	\$2,624,121	0.0%	491		
66168	Minnesota Life Insurance Company	0	\$3,254,577	0.1%	0		
76040	Missouri Valley Life & Health Insurance Co	2	\$486,945	0.0%	755		
57541	Modern Woodmen Of America	0	\$2,142	0.0%	0		
66281	Monumental Life Insurance Company	7	\$7,025,418	0.1%	183		
66370	Mony Life Insurance Company	Ó	\$426,161	0.0%	0		
80020	Mountain Life Insurance Company	0	\$34,429	0.0%	0		
66427	MTL Insurance Company	0	\$6,510	0.0%	0		
	* *			0.0%			
88668	Mutual Of America Life Insurance Company	1	\$107,605		1,709		
71412	Mutual Of Omaha Insurance Company	26	\$54,074,440	0.9%	88		
61409	National Benefit Life Insurance Company	0	\$30,522	0.0%	0		
11991	National Casualty Company	0	\$32,913	0.0%	0		
98205	National Foundation Life Insurance Company	0	\$340,391	0.0%	0		
66583	National Guardian Life Insurance Company	0	\$1,884,602	0.0%	0		
82538	National Health Insurance Company-Suspended-	1					
66680	National Life Insurance Company	0	\$251,386	0.0%	0		
60593	National States Insurance Company	6	\$1,861,389	0.0%	593		

Accident and Health Insurance Complaint Indices	
Alpha by Company	

Code	Name	Complaints	Average Annual	Average	Complaint
		2006-2008	Premium 2006- 2008	Market Share 2006- 2008	Index
87963	National Teachers Associates Life Insurance Co	0	\$1,309,869	0.0%	0
19445	National Union Fire Ins Co of Pittsburgh	18	\$116,766,767	1.9%	28
68225	Nationwide Life Ins Co of America	0	\$16,424	0.0%	0
66869	Nationwide Life Insurance Company	1	\$1,365,525	0.0%	135
91626	New England Life Insurance Company	0	\$377,785	0.0%	0
69698	New England Life Insurance Company New Era Life Ins Co of the Midwest	0	\$225,788	0.0%	0
66915	New York Life Insurance Company	1	\$8,582,021	0.076	21
81264	¥ ,	0		0.176	0
	Nippon Life Insurance Company Of America		\$27,188		
12630	Nmhc Group Solutions Insurance Inc-Withdrew-	0	\$3,957	0.0%	0
66974	North American Co For Life & Health Insurance	0	\$98	0.0%	0
68349	North American Insurance Company	0	\$103,731	0.0%	0
69000	Northwestern Long Term Care Insurance Co	0	\$3,720,663	0.1%	0
67091	Northwestern Mutual Life Insurance Company	1	\$18,868,978	0.3%	10
89206	Ohio National Life Assurance Corporation	0	\$310,917	0.0%	0
67172	Ohio National Life Insurance Company The	0	\$128,765	0.0%	0
67199	Old American Insurance Company	0	\$90,208	0.0%	0
24147	Old Republic Insurance Company	0	\$711,194	0.0%	0
67261	Old Republic Life Insurance Company	0	\$1,370,881	0.0%	0
67326	Old Surety Life Insurance Company	0	\$61,628	0.0%	0
76007	Old United Life Insurance Company	0	\$165,282	0.0%	0
76112	Oxford Life Insurance Company	0	\$169,196	0.0%	0
67393	Ozark National Life Insurance Company	0	\$88,149	0.0%	0
97268	Pacific Life & Annuity Company	0	\$58,921	0.0%	0
67466	Pacific Life Insurance Company	0	\$89,961	0.0%	0
70785	Pacificare Life & Health Insurance Company	5	\$16,819,815	0.3%	55
67539	Pan-american Life Insurance Company	5	\$2,551,626	0.0%	360
67598	Paul Revere Life Insurance Company	5	\$6,041,978	0.1%	152
67628	Pekin Life Insurance Company	0	\$268,359	0.0%	0
67644	Penn Mutual Life Insurance Company The	0	\$132,932	0.0%	0
63282	Penn Treaty Network America Ins Co-Suspended-	5	\$2,741,357	0.0%	335
67660	Pennsylvania Life Insurance Company	5	\$42,251,602	0.7%	22
85561	Perico Life Insurance Company	1	\$1,270,780	0.0%	145
67784	Philadelphia American Life Insurance Company	0	\$668,220	0.0%	0
67814	Phoenix Life Insurance Company	0	\$131,339	0.0%	0
72125	Physicians Life Insurance Company	0	\$1,871,562	0.0%	0
80578	Physicians Mutual Insurance Company	10	\$10,325,736	0.2%	178
68039	Presidential Life Insurance Company	0	\$146,072	0.0%	0
65919	Primerica Life Insurance Company	0	\$8,898	0.0%	0
61271	Principal Life Insurance Company	51	\$79,563,488	1.3%	118
68047	Professional Insurance Company	1	\$365,062	0.0%	504
68136	Protective Life Insurance Company	0	\$285,742	0.0%	0
67903	Provident American Life & Health Insurance Co	0	\$411,273	0.0%	0
68195	Provident Life & Accident Insurance Company	5	\$14,953,759	0.0%	61
68209	Provident Life & Accident Insurance Company Provident Life & Casualty Insurance Company	0	\$134,709	0.2%	01
68241	Prudential Insurance Company Of America The	10	\$12,968,213	0.0%	142

Accident and Health Insurance Complaint Indices	
Alpha by Company	

	Alpha by Company				
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
(0204	D	22	\$17,001, 217		252
68284	Pyramid Life Insurance Company	23	\$16,801,217	0.3%	252
39217	QBE Insurance Corporation	0	\$2,141,979	0.0%	0
70211	Reassure America Life Insurance Company	1	\$1,810,270	0.0%	102
68357	Reliable Life Insurance Company	4	\$379,034	0.0%	1,941
68381	Reliance Standard Life Insurance Company	1	\$16,890,820	0.3%	11
61360	Reliastar Life Ins Co of NY	0	\$539,094	0.0%	0
67105	Reliastar Life Insurance Company	1	\$8,709,765	0.1%	21
61700	Renaissance Life & Health Insurance Co	0	\$73,293	0.0%	0
31089	Republic Western Insurance Company	0	\$68,382	0.0%	0
68462	Reserve National Insurance Company	14	\$8,656,655	0.1%	297
61506	Resource Life Insurance Company	0	\$255,756	0.0%	0
65005	Riversource Life Insurance Company	1	\$5,534,719	0.1%	33
58181	Royal Arcanum Supreme Council Of	0	\$23	0.0%	0
57657	Royal Neighbors Of America	1	\$10,688,704	0.2%	17
79014	Safehealth Life Insurance Company	0	\$35,305	0.0%	0
60445	Sagicor Life Insurance Company	0	\$4,130	0.0%	0
69914	Sears Life Insurance Company	0	\$794,406	0.0%	0
93742	Securian Life Insurance Company	0	\$27,014	0.0%	0
68675	Security Benefit Life Insurance Company	0	\$30,504	0.0%	0
68721	Security Life Insurance Company Of America	2	\$569,382	0.0%	646
68713	Security Life Of Denver Insurance Company	0	\$2,545	0.0%	0
68772	Security Mutual Life Insurance Company Of NY	0	\$28,203	0.0%	0
69485	Security National Life Insurance Company	0	\$1,717	0.0%	0
76325	Senior Health Insurance Company of PA	49	\$6,725,468	0.1%	1,340
24988	Sentry Insurance A Mutual Company	0	\$45,658	0.0%	0
68810	Sentry Life Insurance Company (1&h Acct	1	\$162,961	0.0%	1,128
97241	Settlers Life Insurance Company Settlers Life Insurance Company	0	\$26,353	0.0%	0
65757	Shelter Life Insurance Company	0	\$9,324,938	0.1%	0
68845	Shenandoah Life Insurance Company	0	\$380,407	0.0%	0
71420	Sierra Health & Life Insurance Company Inc	2	\$2,154,261	0.0%	171
12575	Silverscript Insurance Company	0	\$18,727,422	0.3%	0
57673				0.5%	0
	Slovene National Benefit Society	0	\$248		_
57142	Sons Of Norway	0	\$37	0.0%	0
73377	Southern Security Life Insurance Co-Withdrew-	0	\$360	0.0%	0
42986	Standard Guaranty Insurance Company	0	\$202,761	0.0%	0
69019	Standard Insurance Company	15	\$33,054,119	0.5%	83
86355	Standard Life & Accident Insurance Company	7	\$9,560,612	0.2%	135
69078	Standard Security Life Insurance Co Of NY	7	\$4,753,005	0.1%	271
68985	Starmount Life Insurance Company	0	\$14,574	0.0%	0
40045	Starnet Insurance Company	0	\$302,280	0.0%	0
25178	State Farm Mutual Automobile Insurance Co	2	\$31,536,564	0.5%	12
69116	State Life Insurance Company	0	\$939,345	0.0%	0
69132	State Mutual Insurance Company	1	\$1,615,728	0.0%	114
89184	Sterling Investors Life Insurance Company	0	\$9,804,210	0.2%	0
77399	Sterling Life Insurance Company	5	\$5,780,749	0.1%	159

Accident and Health Insurance Complaint Indices	
Alpha by Company	

		y Company			
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
10052	Ct 1 - i 1 C 1t - I C	2	\$01.407		4.020
10952	Stonebridge Casualty Insurance Company	2 27	\$91,487	0.0%	4,020
65021	Stonebridge Life Insurance Company		\$9,037,013	0.1%	549
80926	Sun Life & Health Insurance Company (US	3	\$5,523,197	0.1%	100
80802	Sun Life Assurance Company Of Canada	3	\$13,526,934	0.2%	41
69310	Surety Life Insurance Company	0	\$307	0.0%	0
68608	Symetra Life Insurance Company	1	\$3,928,434	0.1%	47
69345	Teachers Ins & Annuity Assn of America	0	\$885,074	0.0%	0
56014	Thrivent Financial For Lutherans	1	\$11,655,190	0.2%	16
60142	TIAA-CREF Life Insurance Company	0	\$279,832	0.0%	0
69477	Time Insurance Company	94	\$44,814,968	0.7%	386
70688	Transamerica Financial Life Ins Co	0	\$16,817	0.0%	0
86231	Transamerica Life Insurance Company	37	\$25,604,546	0.4%	266
56006	Travelers Protective Association Of America	0	\$42,526	0.0%	0
61425	Trustmark Insurance Company	3	\$1,129,820	0.0%	488
62863	Trustmark Life Insurance Company	11	\$19,598,503	0.3%	103
56456	U S Letter Carriers' Mutual Benefit Ass	0	\$36,357	0.0%	0
29599	U S Specialty Insurance Company	0	\$167,710	0.0%	0
80314	Unicare Life & Health Insurance Company	16	\$29,596,823	0.5%	99
11121	Unified Life Insurance Company	0	\$1,601,663	0.0%	0
91529	Unimerica Insurance Company	0	\$5,284,998	0.1%	0
69701	Union Bankers Insurance Company	1	\$1,781,474	0.0%	103
80837	Union Central Life Insurance Company	0	\$1,113,013	0.0%	0
62596	Union Fidelity Life Insurance Company	1	\$1,286,299	0.0%	143
69744	Union Labor Life Insurance Company	0	\$276,678	0.0%	0
70408	Union Security Insurance Company	14	\$31,541,234	0.5%	82
92916	United American Insurance Company	68	\$25,472,261	0.4%	491
56383	United Commercial Travelers Of America	0	\$600,474	0.0%	0
62294	United Concordia Life & Health Ins Co	5	\$4,272,815	0.1%	215
91693	United Family Life Insurance Company	0	\$201	0.0%	0
79413	United Healthcare Insurance Company	331	\$936,155,061	14.8%	65
63983	United Heritage Life Insurance Company	0	\$3,151	0.0%	0
69922	United Home Life Insurance Company	0	\$835	0.0%	0
69930	United Insurance Company Of America	1	\$95,913	0.0%	1,917
82694	United Liberty Life Insurance Company	0	\$61	0.0%	0
69973	United Life Insurance Company	0	\$17,608	0.0%	0
92703	United National Life Ins Co of America	1	\$108,616	0.0%	1,693
69868	United Of Omaha Life Insurance Company	3	\$7,908,221	0.1%	70
42129	United Security Assurance Company Of PA	0	\$743,269	0.0%	0
81108	United Security Life & Health Insurance Co	6	\$380,947	0.0%	2,896
21113	United States Fire Insurance Company	1	\$1,615,338	0.0%	2,890
70106	United States Life Insurance Co New York	6	\$3,565,831	0.0%	309
63479	United Teacher Associates Insurance Co	25		0.176	1,874
72850			\$2,453,328 \$13,816,007	0.0%	
72850 70114	United World Life Insurance Company	4 0	\$13,816,007 \$13	0.2%	53
	Unity Mutual Life Insurance Company		\$13 \$2.265		_
70130	Universal Guaranty Life Insurance Company	0	\$2,265	0.0%	0

	Accident and Health Inst	rance Compla	int Indices		
	Alpha by	Company			
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
70157	Universal Life Insurance Company-Suspended-	0	\$1,807	0.0%	0
70173	Universal Underwriters Life Insurance Company	1	\$-36,216	- 0.0%	-5078
62235	Unum Life Insurance Company Of America	29	\$51,947,754	0.8%	103
69663	USAA Life Insurance Company	0	\$1,586,835	0.0%	0
94358	Usable Life	0	\$237,123	0.0%	0
53953	Vision Benefits Of America	0	\$2,253,988	0.0%	0
32395	Vision Service Plan Insurance Company	1	\$27,640,989	0.4%	7
70319	Washington National Insurance Co	23	\$5,360,128	0.1%	789
83445	Wellcare Health Insurance Of Arizona Inc	0	\$13,781,721	0.2%	0
10155	Wellcare Prescription Insurance Inc	1	\$23,229,516	0.4%	8
70335	West Coast Life Insurance Company	0	\$741	0.0%	0
70483	Western & Southern Life Insurance Company	0	\$1,086,269	0.0%	0
91413	Western Reserve Life Assurance Co Of Ohio	0	\$55,003	0.0%	0
39845	Westport Insurance Corporation	0	\$986,870	0.0%	0
78301	Westward Life Insurance Company	0	\$6,800	0.0%	0
60704	Wilton Reassurance Life Company Of New York	0	\$834	0.0%	0
57320	Woodmen Of The World Life Insurance Society	0	\$51,923	0.0%	0
57290	Workmens Benefit Fund Of The U S Of Am	0	\$31	0.0%	0
79987	World Corp Insurance Company	0	\$181,091	0.0%	0
70629	World Insurance Company	6	\$2,161,582	0.0%	510
71323	Zale Life Insurance Company	0	\$32,573	0.0%	0
16535	Zurich American Insurance Company	3	\$19,648,536	0.3%	28
	Total	3,431	\$6,309,213,882	100.0%	•

Long Term Care Insurance

Complaint Indices

	Long Term Care Complaint Indices Alpha by Company					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index	
35963	A F & L Insurance Company-Suspended-	12				
60054	Aetna Life Insurance Company	0	\$416,885	0.2%	0	
66842	AIG Life Insurance Company	0	\$509,937	0.2%	0	
20796	AIG Premier Insurance Company	0	\$635	0.0%	0	
90611	Allianz Life Insurance Co Of North America	0	\$5,115,481	2.3%	0	
60186	Allstate Life Insurance Company	0	\$121,070	0.1%	0	
60380	American Family Life Assurance Co of Col.	1	\$552,798	0.3%	170	
19275	American Family Mutual Insurance Company	0	\$815,238	0.4%	0	
60410	American Fidelity Assurance Company	0	\$499,767	0.2%	0	
60488	American General Life Insurance Co	0	\$1,558	0.0%	0	
60534	American Heritage Life Insurance Company	2	\$997,426	0.5%	188	
60763	American Pioneer Life Insurance Company	0	\$80,704	0.0%	0	
60836	American Republic Insurance Company	1	\$982,871	0.4%	96	
60895	American United Life Insurance Co	0	\$3,028	0.0%	0	
71439	Assurity Life Insurance Company	0	\$2,916	0.0%	0	
61190	Auto Owners Life Insurance Company	0	\$78,443	0.0%	0	
61263	Bankers Life & Casualty Company	54	\$19,632,380	8.9%	258	
80985	BCS Life Insurance Company	0	\$94	0.0%	0	
71714	Berkshire Life Insurance Company Of America	0	\$392,356	0.2%	0	
47171	Blue Cross & Blue Shield Of Kansas City	1	\$748,661	0.3%	125	
57487	Catholic Order Of Foresters	0	\$16,487	0.0%	0	
61751	Central States Health & Life Co Of Omaha	1	\$16,733	0.0%	5,612	
61859	Christian Fidelity Life Insurance Co	0	\$256,709	0.1%	0,012	
76236	Cincinnati Life Insurance Company The	0	\$34,389	0.0%	0	
62065	Colonial Penn Life Insurance Company	0	\$1,778	0.0%	0	
62146	Combined Insurance Co Of America	0	\$492,235	0.2%	0	
62308	Connecticut General Life Ins Co	0	\$33,071	0.0%	0	
78174	Conseco Health Insurance Company	1	\$127,458	0.1%	737	
20443	Continental Casualty Company	6	\$6,735,128	3.1%	84	
71404	Continental General Insurance Company	1	\$981,207	0.4%	96	
68500	Continental Life Ins Co Of Brentwood TN	0	\$204,657	0.1%	0	
62553	Country Life Insurance Company	0	\$194,206	0.1%	0	
62626	CUNA Mutual Insurance Society	0	\$609,363	0.3%	0	
62928	EMC National Life Company	0	\$357,788	0.2%	0	
62952	Equitable Life & Casualty Insurance Company	10	\$8,664,050	3.9%	108	
63177	Farmers New World Life Insurance Co	0	\$312,242	0.1%	0	
65536	Genworth Life & Annuity Insurance Company	0	\$311,684	0.1%	0	
70025	Genworth Life Insurance Company	13	\$33,513,836	15.3%	36	
63312	Great American Life Insurance Company	0	\$576,347	0.3%	0	
64211	Guarantee Trust Life Insurance Co		\$880,219	0.5%	107	
64238	Guaranty Income Life Insurance Company	1 0	\$31,565	0.4%		
88072	Hartford Life Insurance Company	0	\$31,303 \$37,194	0.0%	$0 \\ 0$	

Long Term Care Complaint Indices
Alpha by Company

		Company			
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
78972	Healthy Alliance Life Insurance Co	0	\$122,058	0.1%	0
65056	Jackson National Life Insurance Company	0	\$14,713	0.0%	0
65080	John Alden Life Insurance Company	1	\$617,843	0.3%	152
65099	John Hancock Life Insurance Company	8	\$22,942,304	10.4%	33
65110	Kanawha Insurance Company	0	\$344,658	0.2%	0
58033	Knights Of Columbus	0	\$1,467,719	0.7%	0
77720	Lifesecure Insurance Company	0	\$295	0.0%	0
65595	Lincoln Benefit Life Company	2	\$4,703,348	2.1%	40
65676	Lincoln National Life Insurance Company	0	\$180,943	0.1%	0
68446	Longevity Insurance Company	0	\$14,274	0.0%	0
65722	Loyal American Life Insurance Company	0	\$80,220	0.0%	0
65935	Massachusetts Mutual Life Insurance Company	0	\$1,543,868	0.7%	0
69515	Medamerica Insurance Company	0	\$298,137	0.1%	0
31119	Medico Insurance Company	5	\$3,337,248	1.5%	141
71471	Medico Life Insurance Company	0	\$975,841	0.4%	0
97055	Mega Life & Health Insurance Company The	0	\$676	0.476	0
87726	Metlife Insurance Company Of Connecticut	2	\$1,741,920	0.8%	108
65978	Metropolitan Life Insurance Company	4	\$20,074,935	9.1%	19
66087	Midwest National Life Insurance Co Of TN	0	\$57,623	0.0%	0
66168		0	\$63,367	0.0%	0
66281	Minnesota Life Insurance Company	0	\$171,039	0.0%	0
	Monumental Life Insurance Company		· · · · · · · · · · · · · · · · · · ·	0.176	ŭ
66370	Mony Life Insurance Company	0	\$5,162		0
71412	Mutual Of Omaha Insurance Company	1	\$5,291,541	2.4%	18
60593	National States Insurance Company	2	\$868,137	0.4%	216
66915	New York Life Insurance Company	0	\$2,818,850	1.3%	0
69000	Northwestern Long Term Care Insurance Co	0	\$2,796,647	1.3%	0
67199	Old American Insurance Company	0	\$6,980 \$3,100	0.0%	0
67628	Pekin Life Insurance Company	0	\$3,100	0.0%	0
63282	Penn Treaty Network America Ins Co-Suspended-	5	\$2,737,664	1.2%	171
67660	Pennsylvania Life Insurance Company	1	\$351,776	0.2%	267
67784	Philadelphia American Life Insurance Company	0	\$5,275	0.0%	0
80578	Physicians Mutual Insurance Company	0	\$1,010,762	0.5%	0
65919	Primerica Life Insurance Company	0	\$1,887	0.0%	0
61271	Principal Life Insurance Company	0	\$184,954	0.1%	0
68195	Provident Life & Accident Insurance Company	0	\$724,844	0.3%	0
68241	Prudential Insurance Company Of America The	0	\$2,973,742	1.4%	0
68284	Pyramid Life Insurance Company	0	\$56,215	0.0%	0
70211	Reassure America Life Insurance Company	0	\$511,850	0.2%	0
65005	Riversource Life Insurance Company	1	\$3,893,998	1.8%	24
76325	Senior Health Insurance Company of PA	46	\$6,282,813	2.9%	687
24988	Sentry Insurance A Mutual Company	0	\$18,158	0.0%	0
68810	Sentry Life Insurance Company (L&H Acct)	0	\$7,579	0.0%	0
86355	Standard Life & Accident Insurance Company	1	\$173,311	0.1%	542
25178	State Farm Mutual Automobile Insurance Co	0	\$5,173,734	2.4%	0
69116	State Life Insurance Company	0	\$930,055	0.4%	0

Long Term Care Complaint Indices Alpha by Company Complaints Average Annual Code Name Average Complaint 2006-2008 Premium 2006-Market Index 2008 Share 2006-2008 State Mutual Insurance Company 69132 0 \$25,261 0.0%0 65021 Stonebridge Life Insurance Company 18 \$2,217,325 1.0% 762 Teachers Ins & Annuity Assn of America \$550,074 69345 0 0.3% 0 56014 Thrivent Financial For Lutherans 0 \$7,402,156 3.4% 0 60142 TIAA-CREF Life Insurance Company 0 \$279,832 0.1% 0 \$1,695,559 69477 Time Insurance Company 0 0.8%0 Transamerica Life Insurance Company 22 \$12,114,873 5.5% 171 86231 69701 Union Bankers Insurance Company \$153,465 0.1% 612 1 62596 Union Fidelity Life Insurance Company 0 \$90 0.0%0 69744 Union Labor Life Insurance Company 0 0 \$42 0.0%Union Security Insurance Company \$1,692,418 0 70408 0 0.8%92916 United American Insurance Company 2 \$838,632 0.4%224 United National Life Ins Co of America 92703 0 \$2,718 0.0%0 69868 United Of Omaha Life Insurance Company 0 \$245,022 0.1%0 42129 United Security Assurance Company Of PA 0 \$699,515 0.3% 0 63479 United Teacher Associates Insurance Co 0.0%0 0 \$9,888 62235 Unum Life Insurance Company Of America 1 \$9,690,222 4.4% 10 70319 Washington National Insurance Co 7 \$1,166,649 0.5%563 57320 Woodmen Of The World Life Insurance Society 0 \$12,724 0.0%0 70629 World Insurance Company 0 0.0%0 \$146 Total 234 \$219,719,269 100.0%

Medicare Supplement Insurance

Complaint Indices

	Medicare Supplement Insurance Complaint Indices Alpha by Company				
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
71390	Admiral Life Insurance Company Of America	0	\$2,746,418	0.5%	0
20796	AIG Premier Insurance Company	0	\$32,782	0.0%	0
90611	Allianz Life Insurance Co Of North America	0	\$31,755	0.0%	0
60291	American Capitol Insurance Company	0	\$10,868	0.0%	0
60305	American Community Mutual Insurance Co	0	\$1,828	0.0%	0
12321	American Continental Insurance Company	0	\$849,114	0.2%	0
60380	American Family Life Assurance Co of Col.	5	\$896,389	0.2%	1,184
19275	American Family Mutual Insurance Company	0	\$10,132,324	1.9%	0
60410	American Fidelity Assurance Company	0	\$1,337	0.0%	0
66672	American General Life & Accident Insurance Co	0	\$397,875	0.1%	0
13331	American Hardware Mutual Insurance Company	0	\$1,864	0.0%	0
60577	American Income Life Insurance Co	0	\$15,614	0.0%	0
60739	American National Insurance Company	0	\$38,633	0.0%	0
71773	American National Life Ins Co Of TX	1	\$2,961,447	0.5%	72
60763	American Pioneer Life Insurance Company	13	\$5,970,841	1.1%	462
80624	American Progressive Life & Health Ins Co	0	\$12,578	0.0%	0
67679	American Republic Corp Insurance Company	0	\$94,177	0.0%	0
60836	American Republic Insurance Company	6	\$24,640,614	4.6%	52
61190	Auto Owners Life Insurance Company	0	\$25,027	0.0%	0
61239	Bankers Fidelity Life Insurance Co	0	\$232,972	0.0%	0
61263	Bankers Life & Casualty Company	19	\$21,363,775	4.0%	189
69752	Benicorp Insurance Company-Suspended-	1		•	
47171	Blue Cross & Blue Shield Of Kansas City	15	\$27,387,217	5.1%	116
80799	Celtic Insurance Company	0	\$144,837	0.0%	0
63541	Central Benefits National Life Ins Co	0	\$745	0.0%	0
61727	Central Reserve Life Insurance Company	2	\$686,049	0.1%	619
61735	Central Security Life Insurance Co	0	\$5,203	0.0%	0
61751	Central States Health & Life Co Of Omaha	0	\$853,257	0.2%	0
61859	Christian Fidelity Life Insurance Co	1	\$17,488,424	3.2%	12
71463	Cica Life Insurance Company Of America	0	\$188	0.0%	0
62049	Colonial Life & Accident Ins Co	0	\$3,681	0.0%	0
62065	Colonial Penn Life Insurance Company	0	\$356,455	0.1%	0
62146	Combined Insurance Co Of America	1	\$5,412,149	1.0%	39
78174	Conseco Health Insurance Company	10	\$5,430,713	1.0%	391
60682	Conseco Insurance Company	1	\$1,395,650	0.3%	152
65900	Conseco Life Insurance Co	0	\$4,551	0.0%	0
62359	Constitution Life Insurance Company	0	\$74,608	0.0%	0
71404	Continental General Insurance Company	0	\$1,626,417	0.3%	0
68500	Continental Life Ins Co Of Brentwood TN	5	\$21,786,052	4.0%	49
62553	Country Life Insurance Company	0	\$213,258	0.0%	0
56138	CSA Fraternal Life	0	\$867	0.0%	0
62928	EMC National Life Company	0	\$10,097	0.0%	0
62952	Equitable Life & Casualty Insurance Company	3	\$4,818,323	0.9%	132

Medicare Supplement Insurance Complaint	t Indices
Alpha by Company	

		Company			
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
65536	Genworth Life & Annuity Insurance Company	2	\$4,475,800	0.8%	95
70025	Genworth Life Insurance Company	0	\$156,334	0.0%	0
70023	Gerber Life Insurance Company	0	\$9,451	0.0%	0
91472	Globe Life & Accident Insurance Company	1	\$944,745	0.0%	225
62286	Golden Rule Insurance Company	1	· · · · · · · · · · · · · · · · · · ·	0.276	81
63967	Government Personnel Mutual Life Ins Co	0	\$2,614,742	0.5%	
63312			\$44,940 \$20,319	0.0%	0
	Great American Life Insurance Company	0	\$80,318		126
64211	Guarantee Trust Life Insurance Co	1	\$1,683,186	0.3%	126
70815	Hartford Life & Accident Insurance Company	0	\$7,652,644	1.4%	0
88072	Hartford Life Insurance Company	0	\$769,738	0.1%	0
70670	Health Care Service Corporation	0	\$1,243,253	0.2%	0
78972	Healthy Alliance Life Insurance Co	66	\$81,527,706	15.1%	172
73288	Humana Insurance Company	8	\$338,364	0.1%	5,018
97764	Idealife Insurance Company	0	\$180,205	0.0%	0
86509	ING Life Insurance & Annuity Company	0	\$1,254	0.0%	0
64904	Investors Heritage Life Insurance Company	1	\$1,681	0.0%	9,999
63487	Investors Life Insurance Co Of North America	0	\$218	0.0%	0
65056	Jackson National Life Insurance Company	0	\$58,971	0.0%	0
64017	Jefferson National Life Insurance Company	0	\$158,919	0.0%	0
65110	Kanawha Insurance Company	0	\$3,654	0.0%	0
65129	Kansas City Life Insurance Company	0	\$9,916	0.0%	0
77720	Lifesecure Insurance Company	0	\$834	0.0%	0
65927	Lincoln Heritage Life Insurance Company	0	\$102,585	0.0%	0
65722	Loyal American Life Insurance Company	0	\$10,360	0.0%	0
71072	Marquette National Life Insurance Company	1	\$136,392	0.0%	1,556
31119	Medico Insurance Company	1	\$1,190,087	0.2%	178
71471	Medico Life Insurance Company	0	\$309,261	0.1%	0
97055	Mega Life & Health Insurance Company The	0	\$4,31 0	0.0%	0
65978	Metropolitan Life Insurance Company	0	\$178	0.0%	0
66087	Midwest National Life Insurance Co Of TN	0	\$2,328	0.0%	0
66281	Monumental Life Insurance Company	0	\$683,315	0.1%	0
66370	Mony Life Insurance Company	0	\$624	0.0%	0
71412	Mutual Of Omaha Insurance Company	11	\$35,016,678	6.5%	67
61409	National Benefit Life Insurance Company	0	\$1,872	0.0%	0
98205	National Foundation Life Insurance Company	0	\$110,717	0.0%	0
60593	National States Insurance Company	2	\$775,005	0.1%	548
66869	Nationwide Life Insurance Company	0	\$12,165	0.0%	0
69698	New Era Life Ins Co of the Midwest	0	\$153,176	0.0%	0
66915	New York Life Insurance Company	0	\$393,111	0.1%	0
68349	North American Insurance Company	0	\$103,344	0.0%	0
67199	Old American Insurance Company	0	\$23,245	0.0%	0
67326	Old Surety Life Insurance Company	0	\$57,540	0.0%	0
76112	Oxford Life Insurance Company	0	\$150,546	0.0%	0
70785	Pacificare Life & Health Insurance Company	3	\$122,147	0.0%	5,213
67628	Pekin Life Insurance Company	0	\$27,208	0.0%	0

Medicare Supplement Insurance Complaint Indices
Alpha by Company
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Alpha by Company					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
63282	Penn Treaty Network America Ins Co-Suspended-	0	\$3,693	0.0%	0
67660	Pennsylvania Life Insurance Company	1	\$254,035	0.0%	836
67784	Philadelphia American Life Insurance Company	0	\$16,377	0.0%	0
72125	Physicians Life Insurance Company	0	\$1,871,562	0.3%	0
80578	Physicians Mutual Insurance Company	3	\$5,639,292	1.0%	113
61271	Principal Life Insurance Company	1	\$3,526,829	0.7%	60
67903	Provident American Life & Health Insurance Co	0	\$411,273	0.1%	0
68241	Prudential Insurance Company Of America The	0	\$2,372	0.0%	0
68284	Pyramid Life Insurance Company	5	\$343,016	0.1%	3,094
70211	Reassure America Life Insurance Company	0	\$32,063	0.0%	0
68462	Reserve National Insurance Company	1	\$3,225,267	0.6%	66
57657	Royal Neighbors Of America	0	\$10,688,704	2.0%	0
60445	Sagicor Life Insurance Company	0	\$2,953	0.0%	0
76325	Senior Health Insurance Company of PA	0	\$78,520	0.0%	0
65757	Shelter Life Insurance Company	0	\$668,411	0.1%	0
68845	Shenandoah Life Insurance Company	0	\$205,130	0.0%	0
86355	Standard Life & Accident Insurance Company	5	\$9,159,468	1.7%	116
25178	State Farm Mutual Automobile Insurance Co	0	\$10,734,039	2.0%	0
69132	State Mutual Insurance Company	1	\$1,590,466	0.3%	133
89184	Sterling Investors Life Insurance Company	0	\$9,736,719	1.8%	0
77399	Sterling Life Insurance Company	0	\$181,657	0.0%	0
56014	Thrivent Financial For Lutherans	1	\$2,772,552	0.5%	77
69477	Time Insurance Company	0	\$433,673	0.1%	0
70688	Transamerica Financial Life Ins Co	0	\$1,397	0.0%	0
86231	Transamerica Life Insurance Company	6	\$5,241,561	1.0%	243
61425	Trustmark Insurance Company	1	\$66,458	0.0%	3,194
80314	Unicare Life & Health Insurance Company	0	\$25,687	0.0%	0
11121	Unified Life Insurance Company	0	\$21,700	0.0%	0
69701	Union Bankers Insurance Company	0	\$1,619,832	0.3%	0
62596	Union Fidelity Life Insurance Company	0	\$211,091	0.0%	0
69744	Union Labor Life Insurance Company	0	\$64,853	0.0%	0
92916	United American Insurance Company	2	\$10,688,023	2.0%	40
56383	United Commercial Travelers Of America	0	\$566,551	0.1%	0
79413	United Healthcare Insurance Company	16	\$137,278,700	25.5%	25
92703	United National Life Ins Co of America	0	\$56,677	0.0%	0
69868	United Of Omaha Life Insurance Company	0	\$757,437	0.1%	0
63479	United Teacher Associates Insurance Co	21	\$2,093,293	0.4%	2,129
72850	United World Life Insurance Company	4	\$13,816,007	2.6%	61
69663	USAA Life Insurance Company	0	\$1,479,578	0.3%	0
70319	Washington National Insurance Co	5	\$3,584,723	0.7%	296
79987	World Corp Insurance Company	0	\$181,091	0.0%	0
70629	World Insurance Company	0	\$303,116	0.1%	0
	Total	254	\$539,135,882	100.0%	•

Life Insurance & Annuities

Complaint Indices

Life and Annuity Complaint Indices Alpha by Company					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
77879	5 Star Life Insurance Company	0	\$1,761,642	0.0%	0
71854	AAA Life Insurance Company	0	\$2,279,598	0.0%	0
60038	Acacia Life Insurance Co	0	\$550,825	0.0%	0
60054	Aetna Life Insurance Company	10	\$17,302,456	0.2%	288
97780	AGC Life Insurance Company	0	\$1,157	0.0%	0
60232	AGL Life Assurance Company	0	\$35,955	0.0%	0
66842	AIG Life Insurance Company	3	\$2,820,413	0.0%	530
60941	AIG Sunamerica Life Assurance Company	3	\$424,515,410	5.9%	4
90611	Allianz Life Insurance Co Of North America	43	\$186,824,507	2.6%	115
64190	Allianz Life Insurance Company Of New York	0	\$96,608	0.0%	0
60186	Allstate Life Insurance Company	10	\$53,534,546	0.7%	93
70874	Allstate Life Insurance Company Of New York	0	\$43,879	0.0%	0
67369	Alta Health & Life Insurance Company	0	\$22,454	0.0%	0
60216	Amalgamated Life Insurance Company	0	\$111,836	0.0%	0
68594	American Amicable Life Insurance Co of TX	0	\$643,783	0.0%	0
60275	American Bankers Life Assurance Of Florida	6	\$2,151,605	0.0%	1,391
60291	American Capitol Insurance Company	0	\$35,576	0.0%	0
60305	American Community Mutual Insurance Co	0	\$247,500	0.0%	0
92738	American Equity Investment Life Ins Co	10	\$56,291,448	0.8%	89
60380	American Family Life Assurance Co of Col.	4	\$2,326,309	0.0%	857
60399	American Family Life Insurance Company	9	\$49,151,349	0.7%	91
98736	American Federated Life Insurance Company	0	\$85,534	0.0%	0
60410	American Fidelity Assurance Company	4	\$4,658,886	0.1%	428
60429	American Fidelity Life Insurance Company	0	\$384,187	0.0%	0
69337	American Financial Security Life Insurance Co	0	\$10,200	0.0%	0
68373	American General Assurance Company	5	\$1,997,039	0.0%	1,249
66672	American General Life & Accident Insurance Co	42	\$10,770,107	0.1%	1,945
60488	American General Life Insurance Co	29	\$69,658,643	1.0%	208
60518	American Health & Life Insurance Company	4	\$2,385,606	0.0%	836
60534	American Heritage Life Insurance Company	4	\$4,355,951	0.1%	458
60542	American Home Life Insurance Company	0	\$1,598,738	0.0%	0
60577	American Income Life Insurance Co	10	\$9,555,977	0.1%	522
60607	American International Life Assurance Of NY	1	\$372,647	0.0%	1,338
60631	American Investors Life Ins Co	14	\$77,864,007	1.1%	90
81213	American Maturity Life Insurance Co	0	\$6,008	0.0%	0
97179	American Medical Security Life Ins Co	0	\$232,030	0.0%	0
67989	American Memorial Life Insurance Company	0	\$3,315,410	0.0%	0
65811	American Modern Life Insurance Company	4	\$2,135,648	0.0%	934
60739	American National Insurance Company	15	\$36,899,059	0.5%	203
71773	American National Life Ins Co Of TX	0	\$167,884	0.0%	0
60763	American Pioneer Life Insurance Company	1	\$468,974	0.0%	1,063
80624	American Progressive Life & Health Ins Co	0	\$2,084	0.0%	1,003

Life and Annuity Complaint Indices
Alpha by Company

Alpha by Company					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
60801	American Public Life Insurance Company	0	\$15,900	0.0%	0
60836	American Republic Insurance Company	2	\$1,720,176	0.0%	580
88366	American Retirement Life Insurance Company	0	\$345	0.0%	0
92649	American Underwriters Life Insurance Company	0	\$441,532	0.0%	0
60895	American United Life Insurance Co	1	\$102,560,925	1.4%	5
61999	Americo Financial Life & Annuity Ins Co	1	\$3,575,683	0.0%	139
61301	Ameritas Life Insurance Corp	1	\$8,065,465	0.1%	62
72222	AMICA Life Insurance Company	0	\$165,807	0.0%	0
93661	Annuity Investors Life Insurance Company	0	\$725,954	0.0%	0
61069	Anthem Life Insurance Company	0	\$5,975,624	0.1%	0
56499	Assured Life Association	0	\$34,393	0.0%	0
71439	Assurity Life Insurance Company	4	\$2,804,583	0.0%	711
61093	Atlanta Life Insurance Company	2	\$118,902	0.0%	8,388
61182	Aurora National Life Assurance Company	0	\$1,554,911	0.0%	0,500
84522	Auto Club Life Insurance Company	0	\$16,551	0.0%	0
61190	Auto Owners Life Insurance Company	0	\$2,986,169	0.0%	0
61689	Aviva Life & Annuity Company	19	\$75,478,265	1.0%	126
62880	AXA Equitable Life & Annuity Company	0	\$592,786	0.0%	0
62944	AXA Equitable Life Insurance Company	17	\$320,303,854	4.4%	26
68160	1 1	1	\$121,994	0.0%	4,088
61212	Balboa Life Insurance Company Reltimore Life Insurance Company The	0		0.0%	4,000
	Baltimore Life Insurance Company The		\$197,332	0.0%	
61239	Bankers Fidelity Life Insurance Co	0	\$70,226		1 104
61263	Bankers Life & Casualty Company	65	\$27,147,203	0.4%	1,194
81043	Bankers Life Insurance Company	0	\$810,819	0.0%	0
94250	Banner Life Insurance Company	5	\$8,076,781	0.1%	309
80985	BCS Life Insurance Company	0	\$138,544	0.0%	0
61395	Beneficial Life Insurance Company	1	\$1,342,044	0.0%	372
69752	Benicorp Insurance Company-Suspended-	0	\$88,262	0.0%	0
64890	Berkley Life & Health Insurance Company	0	\$37,669	0.0%	0
62345	Berkshire Hathaway Life Insurance Co of NE	0	\$18,333	0.0%	0
71714	Berkshire Life Insurance Company Of America	0	\$50,807	0.0%	0
90638	Best Life & Health Insurance Company	0	\$130	0.0%	0
61476	Boston Mutual Life Insurance Company	2	\$4,822,210	0.1%	207
74900	Brokers National Life Assurance Company	0	\$10,902	0.0%	0
93432	C M Life Insurance Company	1	\$20,805,390	0.3%	24
80659	Canada Life Assurance Company	1	\$2,753,914	0.0%	181
81060	Canada Life Insurance Company Of America	0	\$107,461	0.0%	0
61573	Capital Reserve Life Insurance Company	4	\$2,717,914	0.0%	734
61581	Capitol Life Insurance Company	0	\$1,370	0.0%	0
71455	Cardif Life Insurance Company	8	\$1,794,331	0.0%	2,223
56022	Catholic Family Life Insurance	0	\$35,086	0.0%	0
57770	Catholic Holy Family Society	0	\$392,452	0.0%	0
56030	Catholic Knights	0	\$643,255	0.0%	0
57487	Catholic Order Of Foresters	0	\$214,180	0.0%	0
80799	Celtic Insurance Company	0	\$197	0.0%	0

Life and Annuity Complaint Indices
Alpha by Company

Alpha by Company					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
61727	Central Reserve Life Insurance Company	0	\$136,127	0.0%	0
61735	Central Security Life Insurance Co	6	\$585,879	0.0%	5,107
61751	Central States Health & Life Co Of Omaha	0	\$4,071,298	0.1%	0
61883	Central United Life Insurance Company	1	\$185,917	0.0%	2,682
62383	Centurion Life Insurance Company	0	\$9,590,328	0.1%	0
94447	Century Life Assurance Company	0	\$1,272	0.0%	0
61808	Charter National Life Insurance Co	1	\$3,167	0.0%	9,999
61824	Cherokee National Life Insurance Co	0	\$333,828	0.0%	0
61832	Chesapeake Life Insurance Company The	2	\$1,155,610	0.0%	863
61859	Christian Fidelity Life Insurance Co	0	\$292,332	0.0%	0
61875	Church Life Insurance Corporation	0	\$617,807	0.0%	0
71463	Cica Life Insurance Company Of America	0	\$2,290,094	0.0%	0
76236	Cincinnati Life Insurance Company The	1	\$6,400,693	0.0%	78
61921	Citizens Security Life Ins Co	0	\$183,674	0.0%	0
62049	Colonial Life & Accident Ins Co	3	· · · · · · · · · · · · · · · · · · ·	0.0%	647
62065		3	\$2,312,710 \$2,106,770	0.0%	710
84786	Colonial Penn Life Insurance Company Colorado Bankers Life Ins Co		\$2,106,770 \$666,923	0.0%	0
		0		0.0%	-
76023	Columbian Life Insurance Company	3	\$1,084,951		1,379
62103	Columbian Mutual Life Insurance Co	0	\$69,641	0.0%	0
99937	Columbus Life Insurance Company	0	\$1,501,186	0.0%	0
62146	Combined Insurance Co Of America	6	\$1,995,428	0.0%	1,499
84824	Commonwealth Annuity & Life Insurance Co	1	\$1,948,190	0.0%	256
77828	Companion Life Insurance Company	0	\$53,848	0.0%	0
60984	Compbenefits Insurance Company	0	\$4,340	0.0%	0
62308	Connecticut General Life Ins Co	3	\$7,560,883	0.1%	198
78174	Conseco Health Insurance Company	0	\$99,590	0.0%	0
60682	Conseco Insurance Company	11	\$1,618,774	0.0%	3,389
65900	Conseco Life Insurance Co	12	\$3,130,627	0.0%	1,912
62359	Constitution Life Insurance Company	0	\$59,517	0.0%	0
71730	Continental American Insurance Company	0	\$7,186	0.0%	0
62413	Continental Assurance Company	1	\$975,588	0.0%	511
71404	Continental General Insurance Company	1	\$881,442	0.0%	566
68500	Continental Life Ins Co Of Brentwood TN	0	\$553,032	0.0%	0
94218	Country Investors Life Assurance Company	0	\$872,083	0.0%	0
62553	Country Life Insurance Company	1	\$4,050,792	0.1%	123
56634	Croatian Fraternal Union Of America	0	\$108,177	0.0%	0
80675	Crown Life Insurance Company	0	\$780,170	0.0%	0
56138	CSA Fraternal Life	0	\$24,884	0.0%	0
62626	CUNA Mutual Insurance Society	8	\$22,406,134	0.3%	178
57088	Degree Of Honor Protective Assoc	0	\$106,340	0.0%	0
97705	Direct General Life Insurance Company	0	\$207,499	0.0%	0
62928	EMC National Life Company	1	\$5,241,091	0.1%	95
84174	Employees Life Company (mutual	1	\$94,645	0.0%	5,269
64149	Epic Life Insurance Company The	0	\$34,791	0.0%	0
62952	Equitable Life & Casualty Insurance Company	0	\$688,167	0.0%	0

Life and Annuity Complaint Indices
Alpha by Company

Alpha by Company					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
56057	Equitable Reserve Association	0	\$6,358	0.0%	0
62510	Equitrust Life Insurance Company	7	\$43,345,828	0.6%	81
70742	Family Benefit Life Insurance Company	1	\$1,746,755	0.0%	285
77968	Family Heritage Life Insurance Co Of America	0	\$125	0.0%	0
63053	Family Life Insurance Company	3	\$261,785	0.0%	5,715
74004	Family Service Life Insurance Company	0	\$54	0.0%	0
63118	Farm Bureau Life Ins Co of MO	1	\$32,290,241	0.4%	15
63177	Farmers New World Life Insurance Co	11	\$25,760,186	0.4%	213
63223	Federal Life Insurance Company (mutual	0	\$157,362	0.0%	0
63258	Federated Life Insurance Company	0	\$5,249,029	0.1%	0
93696	Fidelity Investments Life Insurance Company	2	\$22,233,332	0.3%	45
63290	Fidelity Life Association A Legal Reserve Life Ins	2	\$704,813	0.0%	1,415
71870	Fidelity Security Life Insurance Company	4	\$8,962,980	0.1%	223
69140	First Allmerica Financial Life Insurance Co	2	\$217,075	0.0%	4,595
11591	First Berkshire Hathaway Life Insurance Co	0	\$3,421	0.0%	0
56332	First Catholic Slovak Ladies Assn Of The US	0	\$21,188	0.0%	0
56340	First Catholic Slovak Union Of The USA	0	\$3,911	0.0%	0
84034	First Guaranty Insurance Company	0	\$2,915	0.0%	0
90328	First Health Life & Health Insurance Company	3	\$70,239	0.0%	9,999
63495	First Investors Life Insurance Company	0	\$306,575	0.0%	0
67652	First Penn-pacific Life Insurance Company	3	\$3,808,270	0.1%	393
91642	Forethought Life Insurance Company	2	\$7,392,214	0.1%	135
71129	Fort Dearborn Life Insurance Company	1	\$6,833,643	0.1%	73
62324	Freedom Life Insurance Company Of America	0	\$6,003	0.0%	0
99775	Funeral Directors Life Insurance Co	0	\$1,348,857	0.0%	0
63657	Garden State Life Insurance Company	0	\$583,932	0.0%	0
63665	General American Life Insurance Company	23	\$38,728,526	0.5%	296
65536	Genworth Life & Annuity Insurance Company	11	\$51,027,873	0.7%	108
70025	Genworth Life Insurance Company	2	\$10,692,191	0.1%	93
70939	Gerber Life Insurance Company	1	\$4,798,597	0.1%	104
56154	Gleaner Life Insurance Society	0	\$3,782	0.0%	0
91472	Globe Life & Accident Insurance Company	32	\$13,367,831	0.2%	1,194
62286	Golden Rule Insurance Company	1	\$7,075,732	0.1%	70
63967	Government Personnel Mutual Life Ins Co	0	\$614,681	0.0%	0
71218	Grange Life Insurance Company	0	\$52,012	0.0%	0
63312	Great American Life Insurance Company	2	\$18,358,824	0.3%	54
90212	Great Southern Life Insurance Company	3	\$814,673	0.0%	1,836
80705	Great West Life Assurance Company	0	\$440,082	0.0%	0
71480	Great Western Insurance Company	0	\$1,070,911	0.0%	0
68322	Great-West Life & Annuity Insurance Company	0	\$86,944,324	1.2%	0
56685	Greater Beneficial Union Of Pittsburgh	0	\$132,570	0.0%	0
64211	Guarantee Trust Life Insurance Co	2	\$2,608,715	0.0%	382
64238	Guaranty Income Life Insurance Company	0	\$508,100	0.0%	0
78778	Guardian Insurance & Annuity Company Inc	1	\$5,885,421	0.1%	85
64246	Guardian Life Insurance Company Of America	6	\$22,510,301	0.3%	133

Life and Annuity Complaint Indices	
Alpha by Company	

Alpha by Company					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
70815	Hartford Life & Accident Insurance Company	15	\$39,874,326	0.6%	188
71153	Hartford Life & Annuity Insurance Company	13	\$46,789,491	0.6%	139
88072	Hartford Life Insurance Company	7	\$54,350,367	0.8%	64
92711	HCC Life Insurance Company	0	\$479,937	0.0%	0
78972	Healthy Alliance Life Insurance Co	4	\$3,960,143	0.1%	504
66214	Heartland National Life Insurance Company	0	\$41,295	0.0%	0
62421	Heritage Union Life Insurance Company	1	\$159,275	0.0%	3,131
93440	HM Life Insurance Company	0	\$38,534	0.0%	0
64505	Homesteaders Life Company	1	\$6,123,705	0.1%	81
64513	Horace Mann Life Insurance Company	0	\$3,591,241	0.0%	0
93777	Household Life Insurance Company	4	\$4,042,573	0.1%	493
73288	Humana Insurance Company	0	\$720,861	0.0%	0
70580	Humanadental Insurance Company	0	\$50,186	0.0%	0
97764	Idealife Insurance Company	0	\$98,947	0.0%	0
64580	Illinois Mutual Life Insurance Company	0	\$4,202,965	0.0%	0
58068	Independent Order Of Foresters The	1	\$2,354,102	0.0%	212
81779	Individual Assurance Co Life Health & Accident	0	\$3,382,715	0.0%	0
84514	Industrial Alliance Pacific Ins & Financial Service	0	\$16,844	0.0%	0
86509	ING Life Insurance & Annuity Company	1	\$98,461,582	1.4%	5
80942	ING USA Annuity & Life Ins Co	8	\$176,183,258	2.4%	23
74780	•	1	\$10,070,129	0.1%	50
	Integrity Life Insurance Company			0.176	
64831	Intramerica Life Insurance Company	0	\$1,497		0
85189	Investors Consolidated Insurance Company	0	\$533 \$46.153	0.0%	0
64904	Investors Heritage Life Insurance Company	0	\$46,153	0.0%	0
64939	Investors Insurance Corporation	0	\$1,117,108	0.0%	0
63487	Investors Life Insurance Co Of North America	4	\$694,827	0.0%	2,871
89958	J M I C Life Insurance Company	0	\$53,076	0.0%	0
65056	Jackson National Life Insurance Company	20	\$184,133,768	2.5%	54
64017	Jefferson National Life Insurance Company	0	\$5,562,734	0.1%	0
65080	John Alden Life Insurance Company	0	\$460,781	0.0%	0
93610	John Hancock Life & Health Insurance Company	0	\$49,062	0.0%	0
65099	John Hancock Life Insurance Company	12	\$9,837,956	0.1%	608
65838	John Hancock Life Insurance Company (usa	3	\$48,596,519	0.7%	31
90204	John Hancock Variable Life Insurance Company	2	\$21,503,207	0.3%	46
65110	Kanawha Insurance Company	0	\$889,924	0.0%	0
65129	Kansas City Life Insurance Company	9	\$20,377,043	0.3%	220
90557	Kemper Investors Life Ins Co	1	\$2,089,951	0.0%	239
58033	Knights Of Columbus	7	\$20,293,833	0.3%	172
65242	Lafayette Life Insurance Company The	1	\$5,564,041	0.1%	90
71595	Lewer Life Insurance Company	0	\$4,603	0.0%	0
68543	Liberty Bankers Life Insurance Co-Suspended-	5			
65315	Liberty Life Assurance Company Of Boston	0	\$2,699,683	0.0%	0
61492	Liberty Life Insurance Company	7	\$10,511,727	0.1%	332
65331	Liberty National Life Insurance Company	0	\$2,637,566	0.0%	0
65498	Life Insurance Company Of North America	4	\$15,065,460	0.2%	132

Life and A	nnuity	Comp	laint l	Indices
A	lpha by	Comp	any	

C - 1 -		Company	A1	A	Complaint
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
65528	Life Insurance Company Of The Southwest	0	\$6,916,236	0.1%	0
97691	Life Of The South Insurance Company	0	\$614,148	0.0%	0
77720	Lifesecure Insurance Company	1	\$124,825	0.0%	3,995
65595	Lincoln Benefit Life Company	11	\$38,457,805	0.5%	143
65927	Lincoln Heritage Life Insurance Company	3	\$3,502,836	0.0%	427
62057	Lincoln Life & Annuity Company Of New York	2	\$939,556	0.0%	1,062
69833	Lincoln Memorial Life Insurance Co-Suspended-	0	\$13,515,485	0.2%	0
65676	Lincoln National Life Insurance Company	18	\$373,441,584	5.2%	24
68446	Longevity Insurance Company	0	\$12,479	0.0%	0
65722	Loyal American Life Insurance Company	1	\$954,416	0.0%	523
56758	Loyal Christian Benefit Association	1	\$86,308	0.0%	5,778
65781	Madison National Life Insurance Company Inc	0	\$492,260	0.0%	0,770
61018	Magna Insurance Company	0	\$27,551	0.0%	0
60321	Mamsi Life & Health Insurance Company	0	\$195,530	0.0%	0
65870	Manhattan Life Insurance Company	0	\$177,994	0.0%	0
67083	Manhattan National Life Insurance Company	1	\$1,176,536	0.0%	424
71072	Marquette National Life Insurance Company	0	\$8,558	0.0%	0
65935	Massachusetts Mutual Life Insurance Company	6	\$91,096,977	1.3%	33
71471	· ·	0	" ,	0.0%	0
97055	Medico Life Insurance Company Maga Life & Health Insurance Company The		\$44,612	0.0%	_
	Mega Life & Health Insurance Company The	1	\$486,401		1,025
86126	Members Life Insurance Company	0	\$7,311	0.0%	0
65951	Merit Life Insurance Co	0	\$1,616,773	0.0%	0
79022	Merrill Lynch Life Insurance Company	1	\$7,880,013	0.1%	63
87726	Metlife Insurance Company Of Connecticut	8	\$37,958,456	0.5%	105
93513	Metlife Investors Insurance Company	0	\$81,208,296	1.1%	0
61050	Metlife Investors USA Insurance Company	3	\$116,919,914	1.6%	13
65978	Metropolitan Life Insurance Company	59	\$254,613,364	3.5%	116
97136	Metropolitan Tower Life Insurance Company	4	\$2,920,711	0.0%	683
66044	Midland National Life Insurance Company	13	\$46,428,114	0.6%	140
66087	Midwest National Life Insurance Co Of TN	0	\$162,693	0.0%	0
66109	Midwestern United Life Insurance Company	0	\$40,601	0.0%	0
66168	Minnesota Life Insurance Company	4	\$53,731,491	0.7%	37
76040	Missouri Valley Life & Health Insurance Co	0	\$948,339	0.0%	0
70416	MML Bay State Life Insurance Company	1	\$1,329,364	0.0%	375
57541	Modern Woodmen Of America	1	\$19,674,386	0.3%	25
69647	Molina Healthcare Insurance Company	0	\$10,858	0.0%	0
81442	Monitor Life Insurance Company Of New York	0	\$25,647	0.0%	0
66281	Monumental Life Insurance Company	32	\$31,798,809	0.4%	502
66370	Mony Life Insurance Company	0	\$3,377,192	0.0%	0
78077	Mony Life Insurance Company Of America	2	\$3,528,364	0.0%	283
80020	Mountain Life Insurance Company	0	\$223,159	0.0%	0
66427	MTL Insurance Company	0	\$3,741,037	0.1%	0
66362	Mutual Benefit Life Insurance Co-Revoked-	1			
88668	Mutual Of America Life Insurance Company	0	\$645,507	0.0%	0
61409	National Benefit Life Insurance Company	2	\$649,575	0.0%	1,535

Life and Annuity Complaint Indices	
Alpha by Company	

			Alpha by Company					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index			
57568	National Catholic Society Of Foresters	0	\$51,187	0.0%	0			
66540	National Farmers Unions Life Insurance Co	0	\$240,905	0.0%	0			
98205	National Foundation Life Insurance Company	0	\$16,073	0.0%	0			
66583	National Guardian Life Insurance Company	1	\$1,348,851	0.0%	370			
66680	National Life Insurance Company	1	\$7,103,216	0.1%	70			
60593	National States Insurance Company	5	\$1,019,826	0.0%	2,445			
87963	National Teachers Associates Life Insurance Co	0	\$100,781	0.0%	0			
66850	National Western Life Insurance Company	7	\$7,705,783	0.1%	453			
70750	Nationwide Life & Annuity Co Of America	0	\$426,177	0.0%	0			
92657	Nationwide Life & Annuity Insurance Company	0	\$1,866,885	0.0%	0			
68225	Nationwide Life Ins Co of America	0	\$1,450,071	0.0%	0			
66869	Nationwide Life Insurance Company	3	\$14,419,737	0.2%	104			
91626	New England Life Insurance Company	2	\$23,434,245	0.3%	43			
69698	New Era Life Ins Co of the Midwest	0	\$2,987	0.0%	0			
91596	New York Life Insurance & Annuity Corporation	8	\$164,699,971	2.3%	24			
66915	New York Life Insurance Company	17	\$56,062,272	0.8%	151			
81264	Nippon Life Insurance Company Of America	0	\$6,530	0.0%	0			
66974	North American Co For Life & Health Insurance	8	\$35,999,364	0.5%	111			
68349	North American Insurance Company	0	\$887	0.0%	0			
67032	* ·	1	\$1,763	0.0%	9,999			
67091	North Carolina Mutual Life Insurance Company	8		2.8%	19			
	Northwestern Mutual Life Insurance Company		\$204,768,867	0.0%				
81353	NYLife Insurance Company Of Arizona	0	\$1,298,217		0			
67148	occidental Life Insurance Company Of NC	1	\$191,636	0.0%	2,602			
89206	Ohio National Life Assurance Corporation	1	\$10,468,086	0.1%	48			
67172	Ohio National Life Insurance Company The	4	\$42,379,706	0.6%	47			
67180	Ohio State Life Insurance Company The	4	\$1,134,597	0.0%	1,758			
67199	Old American Insurance Company	6	\$5,198,708	0.1%	576			
67253	Old Reliance Insurance Company	0	\$194,124	0.0%	0			
67261	Old Republic Life Insurance Company	0	\$431,669	0.0%	0			
67326	Old Surety Life Insurance Company	0	\$58	0.0%	0			
76007	Old United Life Insurance Company	0	\$323,982	0.0%	0			
63274	Om Financial Life Insurance Company	20	\$50,675,219	0.7%	197			
76112	Oxford Life Insurance Company	1	\$314,423	0.0%	1,586			
67393	Ozark National Life Insurance Company	10	\$20,431,828	0.3%	244			
64343	Pacific Guardian Life Insurance Company Ltd	0	\$14,053	0.0%	0			
97268	Pacific Life & Annuity Company	0	\$80,386	0.0%	0			
67466	Pacific Life Insurance Company	1	\$123,824,418	1.7%	4			
93459	Pan American Assurance Company	0	\$432,189	0.0%	0			
67539	Pan-american Life Insurance Company	1	\$148,023	0.0%	3,369			
60003	Park Avenue Life Insurance Company	0	\$9,692	0.0%	0			
67598	Paul Revere Life Insurance Company	0	\$62,633	0.0%	0			
67601	Paul Revere Variable Annuity Insurance Co	0	\$143,633	0.0%	0			
67628	Pekin Life Insurance Company	0	\$991,555	0.0%	0			
93262	Penn Insurance & Annuity Company	0	\$409,338	0.0%	0			
67644	Penn Mutual Life Insurance Company The	2	\$2,900,553	0.0%	344			

Life and Annuity Complaint Indices
Alpha by Company

Alpha by Company					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
63282	Penn Treaty Ntwk America Ins Co-Suspended-	0	\$29,942	0.0%	0
67660	Pennsylvania Life Insurance Company	8	\$818,161	0.0%	4,876
85561	Perico Life Insurance Company	0	\$7,545	0.0%	0
90247	Pharmacists Life Insurance Company, The	0	\$279,463	0.0%	0
67784	Philadelphia American Life Insurance Company	1	\$8,912	0.0%	9,999
67792	Philadelphia United Life Insurance Company	0	\$75	0.0%	0
93548	PHL Variable Insurance Company	1	\$30,689,366	0.4%	16
93734	Phoenix Life & Annuity Company	0	\$956,234	0.0%	0
67814	Phoenix Life Insurance Company	3	\$24,145,722	0.3%	62
72125	Physicians Life Insurance Company	8	\$4,725,915	0.1%	844
67873	Pioneer American Insurance Company	0	\$45,480	0.0%	0
67911	Pioneer Mutual Life Insurance Company	0	\$712,581	0.0%	0
67946	Pioneer Security Life Insurance Company	1	\$31,390	0.0%	9,999
57622	Polish Natnl Alliance Of The US Of N. A	0	\$64,888	0.0%	0,,,,,
57630	Polish Roman Catholic Union Of America	0	\$139,212	0.0%	0
60048	Preservation Life Insurance Company	0	\$929,256	0.0%	0
68039	Presidential Life Insurance Company	1	\$1,307,701	0.0%	381
65919	Primerica Life Insurance Company	7	\$28,855,722	0.4%	121
61271	* ·	3	\$73,385,703	1.0%	20
68047	Principal Life Insurance Company	0	\$38,007	0.0%	0
88536	Professional Insurance Company	0	\$36,007 \$11,314	0.0%	0
	Protective Life & Annuity Insurance Company	_	· · · ·	3.8%	25
68136	Protective Life Insurance Company	14	\$277,224,806		
67903	Provident American Life & Health Insurance Co	1	\$5,403	0.0%	9,999
68195	Provident Life & Accident Insurance Company	1	\$8,645,467	0.1%	58
68209	Provident Life & Casualty Insurance Company	0	\$2,854	0.0%	0
79227	PRUCO Life Insurance Company	8 7	\$55,237,612	0.8%	72
86630	Prudential Annuities Life Assurance Corporation		\$100,994,598	1.4%	35
68241	Prudential Insurance Company Of America The	37	\$88,357,602	1.2%	209
93629	Prudential Retirement Insurance & Annuity Co	0	\$67,477	0.0%	0
68284	Pyramid Life Insurance Company	3	\$370,688	0.0%	4,036
70211	Reassure America Life Insurance Company	45	\$22,884,575	0.3%	981
68357	Reliable Life Insurance Company	106	\$14,102,926	0.2%	3,748
68381	Reliance Standard Life Insurance Company	0	\$10,072,669	0.1%	0
61360	Reliastar Life Ins Co of NY	2	\$869,352	0.0%	1,147
67105	Reliastar Life Insurance Company	8	\$40,281,816	0.6%	99
61700	Renaissance Life & Health Insurance Co	0	\$78,999	0.0%	0
68462	Reserve National Insurance Company	0	\$112,203	0.0%	0
61506	Resource Life Insurance Company	1	\$433,462	0.0%	1,150
93572	RGA Reinsurance Company	0	\$1,280,713	0.0%	0
65005	Riversource Life Insurance Company	3	\$142,723,813	2.0%	10
58181	Royal Arcanum Supreme Council Of	0	\$1,163	0.0%	0
57657	Royal Neighbors Of America	1	\$562,285	0.0%	887
60183	S USA Life Insurance Company Inc	0	\$2,245	0.0%	0
60445	Sagicor Life Insurance Company	1	\$106,968	0.0%	4,662
70435	Savings Bank Life Insurance Co Of MA	0	\$27,278	0.0%	0

Life and Annuity Complaint Indices	
Alpha by Company	

Alpha by Company					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index
69914	Sears Life Insurance Company	2	\$650,347	0.0%	1,534
93742	Securian Life Insurance Company	0	\$22,230	0.0%	0
68675	Security Benefit Life Insurance Company	1	\$23,838,511	0.3%	21
68721	Security Life Insurance Company Of America	1	\$105,775	0.0%	4,715
68713	Security Life Of Denver Insurance Company	2	\$18,473,765	0.3%	54
68772	Security Mutual Life Insurance Company Of NY	0	\$290,240	0.0%	0
69485	Security National Life Insurance Company Security National Life Insurance Company	0	\$303,775	0.0%	0
76325	Senior Health Insurance Company of PA	1	\$151,799	0.0%	3,285
78662	Senior Life Insurance Company	1	\$658,890	0.0%	757
77119	Sentinel American Life Insurance Co	0	\$104	0.0%	0
68810	Sentry Life Insurance Company (L&H Acct)	0	\$6,918,525	0.0%	0
97241	Settlers Life Insurance Company	0		0.170	0
65757	* *	7	\$21,426	0.0%	_
	Shelter Life Insurance Company		\$30,843,029		113
68845	Shenandoah Life Insurance Company	0	\$1,358,988	0.0%	0
57673	Slovene National Benefit Society	0	\$9,631	0.0%	0
73377	Southern Security Life Insurance Co-Withdrew-	0	\$50,054	0.0%	0
69019	Standard Insurance Company	1	\$44,545,462	0.6%	11
86355	Standard Life & Accident Insurance Company	1	\$811,767	0.0%	614
69051	Standard Life Insurance Company Of Indiana	0	\$214,032	0.0%	0
69078	Standard Security Life Insurance Co Of NY	0	\$2,135	0.0%	0
68985	Starmount Life Insurance Company	1	\$342,270	0.0%	1,457
69108	State Farm Life Insurance Company	15	\$115,424,109	1.6%	65
69116	State Life Insurance Company	2	\$9,692,776	0.1%	103
69132	State Mutual Insurance Company	2	\$419,533	0.0%	2,377
89184	Sterling Investors Life Insurance Company	0	\$40,531	0.0%	0
77399	Sterling Life Insurance Company	0	\$9,419	0.0%	0
65021	Stonebridge Life Insurance Company	14	\$7,139,374	0.1%	978
80926	Sun Life & Health Insurance Company (US	2	\$2,000,711	0.0%	499
80802	Sun Life Assurance Company Of Canada	0	\$22,238,926	0.3%	0
79065	Sun Life Assurance Of Canada (US	3	\$74,143,798	1.0%	20
69256	Sunamerica Life Insurance Company	1	\$60,436	0.0%	8,252
69272	Sunset Life Insurance Company Of America	1	\$111,140	0.0%	4,487
69310	Surety Life Insurance Company	0	\$440,603	0.0%	0
68608	Symetra Life Insurance Company	2	\$26,069,980	0.4%	38
90581	Symetra National Life Insurance Company	0	\$34,484	0.0%	0
69345	Teachers Ins & Annuity Assn of America	0	\$166,416,496	2.3%	0
56014	Thrivent Financial For Lutherans	4	\$77,643,368	1.1%	26
97721	Thrivent Life Insurance Company	0	\$681,909	0.0%	0
60142	TIAA-CREF Life Insurance Company	0	\$2,992,526	0.0%	0
69477	Time Insurance Company	0	\$798,390	0.0%	0
69566	Trans World Assurance Company	0	\$201,198	0.0%	0
70688	Transamerica Financial Life Ins Co	1	\$246,973,168	3.4%	2
86231	Transamerica Life Insurance Company	22	\$113,281,007	1.6%	97
61425	Trustmark Insurance Company	0	\$559,550	0.0%	0
62863	Trustmark Insurance Company Trustmark Life Insurance Company	0	\$61,797	0.0%	0

Life and Annuity Complaint Indices	
Alpha by Company	

69396 TX Life Insurance Com 84530 U S Financial Life Insur 56456 U S Letter Carriers' Mu 86371 Ullico Life Insurance Com 80314 Unicare Life & Health I 11121 Unified Life Insurance Com 91529 Unimerica Insurance Com 69701 Union Bankers Insurance 69701 Union Central Life Insurance 69701 Union Fidelity Life Insur 80837 Union Fidelity Life Insur 62596 Union Fidelity Life Insur 70408 Union Security Insurance 92916 United American Insurance 92916 United American Insurance 92916 United Family Life Insur 91693 United Family Life Insur 91693 United Fidelity Life Insur 91693 United Healthcare Insur 93983 United Heritage Life Insur	npany	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share	Complaint Index
84530 U S Financial Life Insur 56456 U S Letter Carriers' Mu 86371 Ullico Life Insurance C 80314 Unicare Life & Health I 11121 Unified Life Insurance C 91529 Unimerica Insurance C 69701 Union Bankers Insuran 80837 Union Central Life Insur 62596 Union Fidelity Life Insur 70408 Union Security Insurance 92916 Union Security Insurance 92916 United American Insurance 56383 United Commercial Tra 91693 United Family Life Insur 87645 United Fidelity Life Insur 79413 United Healthcare Insur 63983 United Heritage Life Insur	npany			2006- 2008	
84530 U S Financial Life Insur 56456 U S Letter Carriers' Mu 86371 Ullico Life Insurance C 80314 Unicare Life & Health I 11121 Unified Life Insurance C 91529 Unimerica Insurance C 69701 Union Bankers Insuran 80837 Union Central Life Insur 62596 Union Fidelity Life Insur 70408 Union Security Insurance 92916 Union Security Insurance 92916 United American Insurance 56383 United Commercial Tra 91693 United Family Life Insur 87645 United Fidelity Life Insur 79413 United Healthcare Insur 63983 United Heritage Life Insur		0	\$2,031,959	0.0%	0
US Letter Carriers' Mu R6371 Ullico Life Insurance C R0314 Unicare Life & Health I LIT Unified Life Insurance C Unimerica Insurance C Unimerica Insurance C Union Bankers Insurance Union Central Life Insurance Union Fidelity Life Insurance Union Security Insurance Union Security Insurance United American Insurance United Commercial Tra United Family Life Insurance United Fidelity Life Insurance United Healthcare Insurance United Heritage Life Insurance United Heritage		2	\$6,320,991	0.1%	158
86371 Ullico Life Insurance Co 80314 Unicare Life & Health I 11121 Unified Life Insurance Co 91529 Unimerica Insurance Co 69701 Union Bankers Insuran 80837 Union Central Life Insuran 62596 Union Fidelity Life Insuran 62596 Union Fidelity Life Insuran 70408 Union Security Insurana 92916 United American Insuran 92916 United Commercial Tra 91693 United Family Life Insurana 91693 United Fidelity Life Insurana 91693 United Fidelity Life Insurana 91693 United Fidelity Life Insurana 91693 United Fidelity Life Insurana 91693 United Healthcare Insurana 91693 United Healthcare Insurana 91694 United Healthcare Insurana		0	\$113,849	0.0%	0
90314 Unicare Life & Health I 11121 Unified Life Insurance (9) 91529 Unimerica Insurance Co 69701 Union Bankers Insuran 80837 Union Central Life Insu 62596 Union Fidelity Life Insur 69744 Union Labor Life Insur 70408 Union Security Insurance 92916 United American Insurance 56383 United Commercial Tra 91693 United Family Life Insur 87645 United Fidelity Life Insur 79413 United Healthcare Insur 63983 United Heritage Life Insurance		Ö	\$47,812	0.0%	0
Unified Life Insurance Control Union Bankers Insurance Control Union Bankers Insurance Control Union Central Life Insurance Control Union Central Life Insurance Control Union Fidelity Life Insurance Control Union Labor Life Insurance Control Union Labor Life Insurance Control Union Labor Life Insurance Control United American Insurance Control United American Insurance Control United Commercial Transpression United Fidelity Life Insurance Control Union Bankers Insurance Control Union Bank		0	\$1,635,707	0.0%	0
91529 Unimerica Insurance Co 69701 Union Bankers Insuran 80837 Union Central Life Insur 62596 Union Fidelity Life Insur 70408 Union Security Insuran 92916 United American Insura 56383 United Commercial Tra 91693 United Family Life Insur 87645 United Fidelity Life Insur 79413 United Healthcare Insur 63983 United Heritage Life Insur	1 ,	0	\$535,038	0.0%	0
 Union Bankers Insuran Union Central Life Insu Union Fidelity Life Insu Union Labor Life Insur Union Security Insuran Union Security Insuran United American Insur United Commercial Tra United Family Life Insu United Fidelity Life Insu United Fidelity Life Insu United Healthcare Insu United Heritage Life Insu 		1	\$4,735,328	0.1%	105
80837 Union Central Life Insu 62596 Union Fidelity Life Insu 69744 Union Labor Life Insur 70408 Union Security Insuran 92916 United American Insura 56383 United Commercial Tra 91693 United Family Life Insu 87645 United Fidelity Life Insu 79413 United Healthcare Insu 63983 United Heritage Life In		6	\$905,888	0.0%	3,303
 Union Fidelity Life Insuration Union Labor Life Insuration Union Security Insuration United American Insuration United Commercial Tray United Family Life Insuration United Fidelity Life Insuration United Healthcare Insuration United Healthcare Insuration United Heritage Life Insuration 		1	\$40,251,724	0.6%	12
 Union Labor Life Insur Union Security Insurance United American Insur United Commercial Tra United Family Life Insur United Fidelity Life Insur United Healthcare Insur United Heritage Life Insur 	* *	1	\$979,853	0.0%	509
70408 Union Security Insurance 92916 United American Insurance 56383 United Commercial Tra 91693 United Family Life Insurance 87645 United Fidelity Life Insurance 79413 United Healthcare Insurance 63983 United Heritage Life Insurance		0	\$775,835 \$732,318	0.0%	0
92916 United American Insura 56383 United Commercial Tra 91693 United Family Life Insu 87645 United Fidelity Life Insu 79413 United Healthcare Insu 63983 United Heritage Life In		2		0.0%	82
 56383 United Commercial Tra 91693 United Family Life Inst 87645 United Fidelity Life Inst 79413 United Healthcare Inst 63983 United Heritage Life In 	1 7	7	\$12,090,612 \$3,187,709	0.276	
91693 United Family Life Insu 87645 United Fidelity Life Insu 79413 United Healthcare Insu 63983 United Heritage Life In					1,095
 Winted Fidelity Life Insurable United Healthcare Insurable United Heritage Life Insurable 		0	\$60,753	0.0%	0
79413 United Healthcare Insu63983 United Heritage Life In		0	\$59,352	0.0%	0
63983 United Heritage Life In		4	\$566,208	0.0%	3,523
O	1 ,	0	\$5,467,969	0.1%	0
(0000 11: 111 1:6 1		1	\$4,214,420	0.1%	118
69922 United Home Life Insu		1	\$407,694	0.0%	1,223
69930 United Insurance Comp		12	\$170,410	0.0%	9,999
94099 United Investors Life In	ž	1	\$3,279,956	0.0%	152
82694 United Liberty Life Inst	1 7	0	\$364	0.0%	0
69973 United Life Insurance (0	\$4,252,164	0.1%	0
92703 United National Life In		0	\$124,518	0.0%	0
69868 United Of Omaha Life		8	\$29,706,837	0.4%	134
42129 United Security Assurar	nce Company Of PA	0	\$1,575	0.0%	0
81108 United Security Life &	Health Insurance Co	0	\$1,535	0.0%	0
70106 United States Life Insur	rance Co New York	2	\$1,620,733	0.0%	615
63479 United Teacher Associa	ates Insurance Co	1	\$103,168	0.0%	4,834
72850 United World Life Insu	rance Company	0	\$53,177	0.0%	0
63819 Unity Financial Life Ins	surance Company	2	\$1,649,801	0.0%	605
70114 Unity Mutual Life Insur	rance Company	0	\$7,050	0.0%	0
70130 Universal Guaranty Life	1 7	1	\$452,748	0.0%	1,101
70157 Universal Life Insuranc		3	\$35,689	0.0%	9,999
	Life Insurance Company	0	\$427,350	0.0%	0
62235 Unum Life Insurance C	1 ,	4	\$24,930,095	0.3%	80
	ce Company Of Indiana	0	\$12,339	0.0%	0
69663 USAA Life Insurance C		0	\$14,159,188	0.2%	0
94358 Usable Life	r)	0	\$1,189,660	0.0%	0
68632 Vantislife Insurance Co	ompany	0	\$12,213	0.0%	0
70238 Variable Annuity Life In	1 7	3	\$55,483,818	0.8%	27
70319 Washington National In	1 ,	19	\$3,876,013	0.1%	2,445
00037 Watkins Life & Benefit		0	\$40,045	0.0%	2,443
70335 West Coast Life Insurar		2	\$9,261,877	0.0%	108
70483 Western & Southern Li		15	\$6,152,060	0.1%	1,216

	Life and Annuity Complaint Indices Alpha by Company					
Code	Name	Complaints 2006-2008	Average Annual Premium 2006- 2008	Average Market Share 2006- 2008	Complaint Index	
57711	Western Catholic Union	1	\$10,755,757	0.1%	46	
70432	Western National Life Insurance Company	8	\$51,627,944	0.7%	77	
91413	Western Reserve Life Assurance Co Of Ohio	0	\$16,632,340	0.2%	0	
92622	Western Southern Life Assurance Company	4	\$41,411,431	0.6%	48	
57010	William Penn Association	0	\$190,785	0.0%	0	
60704	Wilton Reassurance Life Company Of New York	0	\$161,721	0.0%	0	
65960	Windsor Life Insurance Company	0	\$3,116	0.0%	0	
56170	Woman's Life Insurance Society	0	\$15,578	0.0%	0	
57320	Woodmen Of The World Life Insurance Society	2	\$2,098,628	0.0%	475	
57290	Workmens Benefit Fund Of The U S Of Am	0	\$5,098	0.0%	0	
70629	World Insurance Company	0	\$132,154	0.0%	0	
71323	Zale Life Insurance Company	0	\$26,709	0.0%	0	
	Total	1,449	\$7,226,024,847	100.0%	•	

Health Maintenance Organizations Complaint Indices

	Health Maintenance Organization Complaint Indices (Excluding Medicare and Medicaid) Alpha by Company					
Code	Name Alpha by	Complaints	Average Annual	Average	Complaint	
		2006-2008	Premium 2006- 2008	Market Share 2006-	Index	
				2008		
95810	Aetna Health Inc	12	\$44,348,323	3.1%	94	
47171	Blue Cross & Blue Shield Of Kansas City	0	\$50,717,580	3.5%	0	
95209	CIGNA Healthcare of Ohio Inc	2	\$7,251,137	0.5%	96	
95635	CIGNA Healthcare Of St Louis Inc	1	\$9,314,070	0.6%	37	
95145	Community Health Plan	7	\$32,690,032	2.3%	75	
95489	Coventry Health Care Of Kansas Inc	65	\$155,445,075	10.8%	146	
95530	Cox Health Systems HMO Inc	5	\$19,788,232	1.4%	88	
95315	Good Health HMO Inc DBA Blue-care Inc	54	\$241,079,218	16.7%	78	
10253	Great-West Healthcare Of KS/MO-Withdrew-	2				
96377	Group Health Plan Inc	61	\$221,761,737	15.4%	96	
96475	Healthlink HMO Inc DBA Healthlink HMO	0	\$685,423	0.0%	0	
95358	HMO Missouri Inc DBA Anthem Blue Cross & Blue Shield	117	\$370,149,591	25.7%	110	
95885	Humana Health Plan Inc	22	\$56,121,091	3.9%	137	
95309	Mercy Health Plans Of Missouri Inc	23	\$130,838,770	9.1%	61	
96385	United Healthcare Of The Midwest Inc	42	\$100,561,785	7.0%	146	
	Total	413	\$1,440,752,063	100.0%	•	